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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 10 1987

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: ID-870006: Section 24(c) Special Local Need Registration for Wilbur-Ellis Dimethoate 267 to control winter grain mites, aphids, thrips, and plant bugs on grass grown for seed. No Accession No., RCB No. 2461.

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Thru: *for* Edward Zager, Section Head *L. Cheng*  
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To: William Miller, PM-16  
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The Idaho Department of Agriculture has issued a Section 24 (c) Registration, Special Local Need (SLN), for Wilbur-Ellis Dimethoate 267 to control winter grain mites, aphids, thrips, and plant bugs on grass grown for seed.

Wilbur-Ellis Dimethoate 267, EPA Reg. No. 2749-41-2935, is a registered trademark of Wilbur-Ellis Company. The product contains 30.5% dimethoate (2.67 lbs. a.i./gallon)[O,O-dimethyl S-(N-methylcarbamoylmethyl)phosphorodithioate] as its active ingredient. Wilbur-Ellis is a supplemental distributor for the product registered by Aceto (EPA Reg. 2749-41).

Tolerances are established (40 CFR 180.204) for total residues of dimethoate and its oxygen analog in or on several raw agricultural commodities. Tolerances range from 0.02 ppm in fat, meat, and mbyp of animals to 2.0 ppm in or on various fruits and vegetables. No tolerance is established for grass.

A Registration Standard for dimethoate was issued 9-30-82.

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ID-870006 calls for application of 3/4 to 1.0 pint of product (0.25 to 0.33 lbs. a.i.) per acre. The product is applied with either ground or aerial spray equipment utilizing a minimum of 2 gallons of water per acre. The SLN label contains the following use restrictions: do not apply within 14 days of harvest, and do not graze or use seed or seed screenings for feed purposes. The type of grass to be treated is not specified.

Uses on crops where the seed itself is a major raw agricultural commodity (corn, sorghum, soybeans, small grains and sunflowers) are considered to be food uses. In these cases seeds from treated crops can not be distinguished from the untreated crops and could potentially be diverted to human and animal consumption.

#### Conclusions

We conclude that the proposed use is a food use since treated grass, grass hay, refuse, and/or surplus seed could be used as animal feed. Therefore, either a tolerance or exemption from tolerance is required for residues of dimethoate in or on grass (fresh, hay, and grain).

#### Recommendation

We recommend against the issuance of this Section 24 (c) registration.

cc:R.F.,S.F.,Circu,Reviewer,24(c),non-food use,PMSD/ISB  
RDI:LC:7/9/87:RDS:7/9/87  
TS-769:RCB:FBS:fbs:557-1883:CM#710:7/9/87