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

7-23-87

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#3E2889 (RCB No. 2302) Dimethoate on Blackberries and Raspberries. Evaluation of an Amendment Received June 1, 1987 (MRID #36297).

FROM: V. Frank Boyd, Ph.D., Chemist
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: John H. Onley, Ph.D., Section Head
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Hoyt L. Jamerson
Minor Use Officer
Registration Support and Emergency Response Banch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Dr. Jerry J. Baron on behalf of Interregional Research Project 4 has responded to EPA's letter of April 8, 1987 by submitting an Amended Section B and an Amended Section F for PP#3E2889.

Deficiency:

RCB in the evaluation of PP#3E2889, as amended by the IR-4 submission of 6/18/86, concluded, "RCB cannot recommend for establishing the proposed tolerance of 0.2 ppm dimethoate on blackberries and raspberries resulting from the proposed use due to insufficient residue data."

Petitioner's Response:

(1) Amended Section B limits the use of Cygon® 400 on raspberries and blackberries to NY and WA only. The proposed use remains 0.5 lb.ai/A in 100 to 200 gal. of water, with a PHI of 28 days, and one application per season.

(2) Amended Section F proposes a tolerance of 0.2 ppm dimethoate and its oxygen analog on raspberries and blackberries as a Tolerance with Regional Registration. For Use in the States of New York and Washington only.

RCB's Comments/Conclusions:

Residue data submitted previously were obtained from two Geneva, New York studies (raspberries-1975 and blackberries-1985) and from a Washington study (blackberries-1985). These data reported maximum residues of 0.09 ppm in raspberries, 0.04 ppm in blackberries (Washington) and 0.11 ppm in blackberries (New York), resulting from the proposed use.

Blackberries and raspberries are among the listed low dietary intake crops which are eligible for a tolerance with regional registration (CFR Vol. 51.,No 63, April 2, 1986, Policy statement on Minor Uses of Pesticides). The residue data indicated that a tolerance of 0.2 ppm for dimethoate and its oxygen analog [O,O-dimethyl S-(N-methylcarbamoylmethyl) phosphorothioate] would not be exceeded by the proposed use.

Recommendations:

RCB recommends for establishing the proposed tolerance of 0.2 ppm dimethoate on blackberries and raspberries, providing TOX and EAB considerations permit.

The applicable Codex Sheet is attached to the 9/10/86 review of PP#3E2889. There are no compatability problems since Codex tolerances for dimethoate have not been established for bushberries.

Since the proposed use is restricted to raspberries and blackberries grown in New York and Washington, only, any tolerance for dimethoate on these crops should be included in a separate subsection under 40 CFR 180.204 to avoid confusion regarding 24(c) registrations and crop-grouping eligibility. The "tolerances

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with regional registration" would be referenced along with future regional registration tolerances in a new subsection (n) under 40 CFR 180.1 which would define the Agency's interpretation of "tolerances with regional registration." An appropriate interpretation for 40 CFR 180.1, subsection "n," would be:

> Certain tolerances are based on geographically limited residue data. These "tolerances with regional registration" are included in separate subsections under 40 CFR 180.101 through 180.99. In order to expand the area of usage on these crops, additional residue data generated in these areas will be required. Persons seeking geographically broader registration on these crops should contact the appropriate EPA Product Manager concerning whether additional residue data are required.

cc:RF., Circu., PMSD/ISB, PP#3E2889, F. Boyd
RDI: J.H. Onley:7/21/87:R.D. Schmitt:7/22/87
RCB:TS-769:F. Boyd:mt:CM#2:Rm.804:x7379:7/23/87