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PP#6G1850/6H5145. Nemacur on pineapple. Request for extension of experimental use permits and temporary tolerances.

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THRU: Richard D. Schmitt, Deputy Branch Chief
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The Pineapple Growers Association of Hawaii is requesting extension of experimental use permits 38412-EUP-1 and 38412-EUP-2 and temporary tolerances for combined residues of the nematocide Nemacur [ethyl 3-methyl-4-(methylthio) phenyl (1-methylethyl) phosphoramidate] and its cholinesterase-inhibiting metabolites in pineapple fruit at 0.2 ppm and pineapple bran at 10 ppm.

The current EUP's and tolerances were established 9/9/77 in connection with this petition and expired 8/31/80. This request would extend the EUP's/tolerances to 8/31/83 to allow further research on another three year pineapple cycle.

No change is being requested in the use pattern for Nemacur 3 Emulsifiable under 38412-EUP-1. The label still allows a preplant treatment (10-20 lbs ai/A) and multiple postplant treatments (1-3 lbs ai/A) with a maximum of 40 lbs ai/A per plant crop. The first ratoon crop may receive a total of 30 lbs ai/A by multiple applications of presumably 1-3 lbs ai/A. The petitioner should be notified that the rate of postplant applications in terms of gallons has not been inserted on the label. Based on the formulation of 3 lbs/gal the rate should be 1/3-1 gallon. We also note that there is an inconsistency concerning the maximum application rate per plant crop. In two places it is listed as 40 lbs ai./A, while on sheet 2 of the label the "40" has been crossed out and replaced by "20" lbs ai/A. In addition, the EUP calls for 28,146 lbs ai to be shipped. Even at a maximum usage of 40 lbs ai/A for the first crop and 30 lbs ai/A for two ratoon crops, only 10,000 lbs ai total would be needed to treat 100 acres.

For extension of 38412-EUP-2 a total of 4725 lbs Nemacur 15% Granular (709.75 lb ai) is to be shipped. Although the label submitted in Section 8 indicates no change in the preplant treatment rate (10-20 lbs ai/A), the petitioner is requesting in Section 8 an increase to 40 lb ai/A as a preplant treatment only. Although none of the residue studies submitted in PP#6G1850 reflected a preplant treatment only, one study did use a 20 lb ai/A preplant with Nemacur 15% Granular and 5 postplant treatments with 5

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lbs ai/A Nemacur 3E (total 50 lbs ai/A). The residues were 0.14 ppm in the fruit and 2.30 ppm in bran. We expect that residues from the 40 lb ai/A preplant use will not exceed the established temporary tolerances.

Conclusions and Recommendations

We conclude that residues from the proposed use will not exceed 0.2 ppm in pineapple fruit and 10 ppm in pineapple bran.

Toxicological considerations permitting, we recommend for the extension of the temporary tolerances and experimental use permits. However, we wish to note the following inconsistensies concerning the proposed labels:

1. The rate of postplant treatments in terms of gallons/acre is not specified on the Nemacur 3E label.

2. The maximum application of Nemacur 3E per plant crop is listed as different values on separate parts of the label.

3. The quantity of Nemacur 3E to be shipped is approximately 3 times greater than the quantity needed for the proposed 100 acre experimental program.

4. The label in Section B for Nemacur Granular does not show the maximum use rate requested in Section G.

cc: Reading file
Circu
Reviewer
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Randy Watts

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