



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

JAN 8 1982

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. No's 707-98 and 707-159. Kerb on lettuce

FROM: Edward Zager, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

*Edward Zager*

TO: Robert J. Taylor, Product Manager #25  
Fungicide-Herbicide Branch  
Registration Division (TS-767)

THRU: Charles L. Trichilo, Chief  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

*[Signature]*

Rohm and Haas is requesting a revision of the preharvest interval for Kerb 50-W Herbicide (EPA Reg. No. 707-98) and Kerb 50-W Herbicide (in water soluble Pouches) (EPA Reg. 707-159) on lettuce (for background see E. Zager's memo of 7/30/80).

The PHI of 35 days would be imposed for Kerb uses on lettuce in areas West of the Mississippi and a PHI of 60 days would be imposed east of the Mississippi.

We discussed the practicality of a 60 day PHI in our memo of 5/14/80 by E. Zager. To reiterate:

We contacted Dr. W. O Drinkwater, Prof. of Vegetable Crops at the State University of New Jersey (Rutgers). Dr. Drinkwater informed us that loose leaf lettuce requires 45-55 days to maturity. According to Dr. Drinkwater, loose leaf lettuce is usually direct seeded in N.J. Head lettuce grown in NJ requires 85-95 days from seeding till harvest. If transplanted, the time required for head lettuce to mature is shortened by 28 days.

We thus conclude that a 60 day PHI is not practical for leaf lettuce.

Based on the residue data contained in the submission of 3/5/81 and PP#1F1139 reviewed in the 7/30/81 memo by E. Zager, we conclude that residues of Kerb from the currently registered uses may exceed 1 ppm in or on head and leaf lettuce at a 35-day PHI, both west and east of Mississippi. We also conclude that residues of Kerb in or on head lettuce will not exceed 1 ppm at a 60 day PHI, from pre-emergence or at-transplant applications.

Conclusions

1. Residues of Kerb from the currently registered uses may exceed 1 ppm in or on head and leaf lettuce at a 35 day PHI, both west and east of the Mississippi.
2. Residues of Kerb in or on head lettuce will not exceed 1 ppm at a 60 day PHI from either pre-emergence or at-transplant applications.
3. A preharvest interval of 60 days is not practical for leaf lettuce either west or east of the Mississippi.

Recommendation

For the reasons listed in Conclusions 1 and 3 we recommend against the proposed labelling change.

A 1 ppm tolerance for residues of Kerb in or on lettuce would be adequate if the use of Kerb were limited to head lettuce only with a 60 day PHI both west and east of the Mississippi.

cc: Kerb S.F.

Circu

Reviewer

PP#1F1139

Amended use file

TS-769:Reviewer:E.Zager:LDT:X77324:CM:#2:RM:810:Date:1/8/82

TDI:Section Head:RHJ:Date:1/7/82:RDS:Date:1/8/82