



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

PT

January 11, 1989

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 89-TX-02, Asana XL (Esfenvalerate) on Kale, Kohlrabi,
and Mustard Greens
Addendum to DEB No. 4683

FROM: Susan V. Hummel, Chemist
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THRU: Edward Zager, Section Head *EZager*
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TO: L. Pemberton/D. Stubbs, PM#41
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

Libby Pemberton (RSERB) requested that we reevaluate our request for a restriction to ground application for Asana XL. The State of Texas now requests a crisis exemption for the use of Asana XL (EPA Reg. No. 352-515), containing 8.5% esfenvalerate (0.66 lb/gal), on kale, kohlrabi, and mustard greens to control the cabbage looper.

We previously concluded that residues of fenvalerate on kale, kohlrabi, and mustard greens would not be likely to exceed 30 ppm, provided that use is limited to ground application (S. Hummel memo of 1/6/89, DEB#4683). Our conclusion was based on the lack of aerial data for mustard greens and spinach. DuPont has informed us that Asana XL is currently registered for aerial application to brassica crops and that aerial data are available for celery, cabbage, cauliflower, and broccoli, although the tolerances or proposed tolerances for these crops are much lower than the proposed tolerance for mustard greens.

Residue data from aerial application of Pydrin in AZ are available for cabbage in PP#1F2536. However, there are no data from ground application in AZ. Residue data for ground application of Pydrin to cabbage are available from FL, SC, WI, CA, and NY. For cauliflower and broccoli, one side by side test each, for ground and aerial applications, was done in AZ. Similar residues were found in the side by side tests. For celery, ground and aerial applications of Pydrin were used in FL.

Aerial applications only were used in CA. Lower residues were found from aerial application in FL.

Conclusion

Based on the data discussed above, for this Section 18 only, we can conclude that residues of fenvalerate in kale, kohlrabi, and mustard greens from the use of Asana XL applied either by ground or aerial application are not likely to exceed 30 ppm.

Recommendation

We have no objections to the inclusion of aerial application on the Section 18 label.

cc:R.F., circu, S. Hummel, S.F., Section 18 S.F., TAS, PMSD/ISB
RDI:EZ:01/11/89:RDS:01/11/89
TS-769:RCB:SVH:SVH:RM:810:CM#2:01/11/89