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

OCT 15 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#'s 2E2649 and 2F2746 Fenvalerate on Trefoil and Peanuts and soybeans. Amendments of 8/29/84 and 9/11/84 respectively (No accession numbers).

FROM: R. B. Perfetti, Ph.D., Chemist
Residue Chamistry Branch
Hazard Evaluation Division (TS-769)

THRU: R. S. Quick, Section Head
Tolerance Petition Section I
Residue Chemistry Branch/HED (TS-769)

TO: Minor Crops Officer (H. Jamerson), ERS, RSERB, Registration Division (TS-767C), Product Manager No. 17 (T. Gardner) IRB, RD (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

These amendments are in response to our memos of 8/9/84 (K. Arne) and 4/27/83 (R. Perfetti) in which RCB concluded the following:

PP# 2F2746: a revised Section F proposing new tolerance levels on the subject crops is needed. The petitioner has submitted this Section F. We consider this deficiency resolved.

PP# 2E2649:

1.) Residues of Pydrin per se would not be expected to exceed the proposed 10 and 25 ppm tolerance levels for trefoil and trefoil hay respectively provided the label prescribes a maximum of 1 application per year. A revised Section B is needed.

2.) Residues of the photodegradate of Pydrin in trefoil and trefoil hay would not be expected to exceed 1 and 2.5 ppm respectively provided the use is restricted as discussed in conclusion 1 above.

4.) In light of the currently proposed 50 ppm tolerance for corn forage and fodder containing up to 10% of the photo-degradate of pydrin any burden placed on the diet of cattle with respect to this use on trefoil would be adequately covered under the higher tolerances proposed for meat and milk resulting from use on corn. Resolution of the questions regarding Pydrin and its photodegradate in PP# 1F2430 will result in resolution of any questions with respect to trefoil. Therefore no favorable recommendation for this use on trefoil can be made until the questions with respect to Pydrin and its photodegradate raised in PP# 1F2430 are addressed and appropriate tolerances in meat and milk are established.

The petitioner has submitted a revised Section B prescribing only 1 application per cutting . Since fenvalerate is mainly a "surface" residue we have no objection to this label restriction. However, subsequent to this review, a petition for the same use of fenvalerate on alfalfa was submitted. Residue data in that petition showed that a 30 ppm tolerance level for alfalfa and alfalfa hay was most appropriate. For consistency and in light of the similarity between alfalfa and trefoil we now conclude that the 30 ppm tolerance levels should also be proposed for trefoil and trefoil hay. A revised Section F is needed, the petitioner should be so informed. We do not consider deficiency 1 resolved.

Deficiency 2 is also considered to be resolved in light of TOX's conclusion regarding the photodegradate of fenvalerate.

With respect to deficiency 4, no tolerance for trefoil can be established until the higher tolerances on meat and milk (See PP#'s 2F2657, 4F2003 and 4F3004.) are also established.

Other Considerations

The International Tolerance Sheet is attached. There are no tolerances for residues of fenvalerate on the subject r.a.c.'s, therefore no compatibility questions exist with this petition.

Recommendation

TOX and EAB considerations permitting we recommend that the following tolerances be established:

peanut forage	10
peanut hay	40
soybean forage	10
soybean hay	40

Note to PM: When the soybean straw tolerance is established the commodity should be named as soybean hay instead of straw.

We recommend that the proposed tolerances on trefoil not be established. A revised Section F proposing a level of 30 ppm in both trefoil and trefoil hay is needed. Also, these tolerances cannot be established until such time as the new higher tolerances for meat and milk (vide supra) are established.

The petitioners should be informed that RCB is undertaking a review of the metabolism of several pyrethroids to insure consistency in the way in which these compounds are regulated. This may result in our requiring that metabolites of Pydrin be included in the tolerance expression.

At this time however we are not withholding a favorable recommendation for the peanut and soybean tolerances because an acceptable metabolism study for soybeans has been submitted previously.

TS-769:RCB:R.Perfetti:vg:CM#2:Rm810:X77485:10/9/84
cc: RF, Circ., Thompson, FDA, TOX, EEB, EAB, PP#'s 2E2649-2F2746
RDI: R. Quick, 10/4/84; Schmitt, 10/4/84

INTERNATIONAL RESIDUE LIMIT STATU

CHEMICAL alpha-cyano (3-phenoxy phenyl) methyl-4-chloro-alpha-(1-methylethyl)-benzeneacetate fenvalerate PETITION NO 2F2746 and 2E2649

CCPR NO. 119

ND 9/26/84

Codex Status

☐ No Codex Proposal Step 6 or above

Proposed U. S. Tolerances

Residue (if Step 9): _____

fenvalerate (fat-soluble residue)

Residue: fenvalerate

Crop(s)	Limit (mg/kg)
peanuts (whole)	0.1
soybeans	0.1

Crop(s)	Tol. (ppm)
Peanut forage	10
Peanut hay	40
Soybean forage	10
Soybean straw	40
Trefoil	10
Trefoil hay	25

CANADIAN LIMIT

Residue: α-cyano-3-phenoxybenzyl 2-(4-chlorophenyl)-3-methylbutyrate

MEXICAN TOLERANCIA

Residue: _____

Crop	Limit (ppm)
peanuts	0.1*

Crop	Tolerancia (ppm)
None	

Notes:

* Negligible residues