


FILE

109301

Date Out EFB: 20 MAR 1984

TO: Tim Gardner/Heyward
Product Manager
Registration Division
TS-767

FROM: Samuel Creeger, Chief 
Review Section No. 1
Exposure Assessment Branch
Hazard Evaluation Division

Attached please find the environmental fate review of:

Reg./File No.: 201-401

Chemical: Fenvalerate

Type Product: Insecticide

Product Name: Pydrin 2.4 EC

Company Name: Shell Chemical Co.

Submission Purpose: Add new use on celery

ZBB Code: other

ACTION CODE: 330

Date in: 1/17/84

EFB # 4168

Date Completed: 3/19/84

TAIS (level II) Days

63

1.5

Deferrals To:

 Ecological Effects Branch

 Residue Chemistry Branch

 Toxicology Branch

1.0 INTRODUCTION

Shell Chemical Company has submitted an application for registration of Pydrin 2.4 EC (Fenvalerate as a. i.) for use on celery.

1.1 Chemical

Common name: Fenvalerate

Chemical name: Cyano (3-phenoxyphenyl) methyl-4-chloro-alpha-(1-methylethyl benzeneacetate)

2.0 DIRECTIONS FOR USE

Complete use directions are appended to this review. Briefly, apply 0.05 - 0.2 lb. a. i./acre (2-2/3 to 10-2/3 fl. oz./acre). Repeat as necessary to maintain control. Do not exceed 2 lbs. active ingredient per acre per season.

The proposed label bears the following rotational crop restriction: Crops in this label may be planted immediately after last treatment. Do not plant other root crops within 12 months or all other crops within 60 days after last treatment.

Note: The proposed label directions contain an apparent type error in the application rate for cabbage looper control. It is given as 0.05 to 0.01 lb a. i./acre. The fluid ounce directions equal 0.05 to 0.1 lb a. i./acre.

3.0 DISCUSSION OF DATA

3.1 Adequate environmental fate data with the exception of rotational crop data (see Section 3.2, below) have been submitted to support the proposed use of Pydrin 2.4 EC on celery.

3.2 This reviewer notes that the proposed label bears a restriction against planting other root crops (other than those on currently on the label) within 12 months or all other crops within 60 days after last treatment.

This reviewer notes the previous EAB review (dated 1/16/79) in which a rotational crop restriction of 270 days for non-root crops appeared to be justified based on the (then) submitted data. A shorter interval should be backed up by residue data for leafy vegetable and small grain crops using a shorter interval (than 270 days) post-treatment/planting interval.

Also, this reviewer notes that, based on the available copies of past Pydrin 2.4 EC labels in EAB files, the 270 day restriction relating to non-root crops was never added to the label. However, the labels do bear a restriction against rotating root crops within one year.

Additional rotational crop data were submitted and reviewed by EAB in review dated 11/13/80. EAB concluded that the submitted data did not support a change in the currently recommended rotational crop restriction.

In response to an application for registration of Pydrin 2.4 EC on cabbage, EAB noted that the rotational crop restriction currently recommended (12 months for root crops and 9 months for all other crops) must apply to the use on cabbage. See EAB review dated 8/31/81.

4.0 RECOMMENDATION

- Sep. review dated 4/20/84 of 4/20/84*
- 4.1 EAB notes some confusion in the rotational crop restriction on the proposed label. Rotational crop data are not available to support the restriction against planting "all other crops within 60 days after last treatment". Thus, in addition to the restriction against planting "other root crops earlier within 12 months," the label must bear the restriction against planting "all other crops within 9 months of last application."

If available, the registrant should submit the rotational crop data that support the 60 day interval.

- 4.2 All other environmental fate data requirements have been satisfied and support the proposed use of Pydrin 2.4 EC for use on celery.



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Page ____ is not included in this copy.

Pages 4 through 5 are not included.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients.
- ☐ Identity of product impurities.
- ☐ Description of the product manufacturing process.
- ☐ Description of quality control procedures.
- ☐ Identity of the source of product ingredients.
- ☐ Sales or other commercial/financial information.
- ☒ A draft product label.
- ☐ The product confidential statement of formula.
- ☐ Information about a pending registration action.
- ☐ FIFRA registration data.
- ☐ The document is a duplicate of page(s) _____.
- ☐ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.