



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

OCT 22 1986

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Reading

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Shell ASANA Insecticide (Fenvalerate or Pydrin SS)
EPA File Symbols 201-URI and 201-URO
[RCB Nos. 1409, 1410; No Accession No.]

FROM: Susan V. Hummel, Chemist
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Susan V. Hummel

THRU: Edward Zager, Section Head
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TO: George LaRocca, PM#15
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Registration Division (TS-767)

Shell Oil Company has submitted a response to our review of their previous submission for ASANA Insecticide (S. Hummel; RCB Nos. 1283, 1284; Accession No. 264097). Additional information was submitted regarding Acceptable Daily Intake (ADI) calculations for ASANA Insecticide based on tolerances for those crops that were registered for PYDRIN Insecticide as of July 1984.

An application for registration of ASANA Insecticide is pending. ASANA technical contains 75% SS isomer of fenvalerate [cyano(3-phenoxyphenyl)methyl- -1-methylethyl-4-chlorobenzene acetate], a synthetic pyrethroid. Shell's currently registered product, PYDRIN, contains a racemic mixture of four stereoisomers in equal concentrations. The SS isomer is insecticidally active. The application rates for ASANA 1.9 EC are the same as the application rates of the SS isomer of PYDRIN in PYDRIN 2.4 EC. Thus, the amount of ASANA active ingredient (predominantly SS isomer) applied per acre is approximately one-fourth the amount of PYDRIN active ingredient applied per acre (all isomers).

Tolerances for residues of fenvalerate have been established on a variety of raw agricultural commodities including meat and milk at 0.1 to 50 ppm [40 CFR 180.379] and feeds [21 CFR 561.97].

RCB has previously reviewed the application for registration of ASANA 1.9 EC, formerly known as SS PYDRIN 1.9 EC (L. Cheng, 11/26/84 and 7/10/85). RCB recommended for the registration of ASANA (L. Cheng, 7/10/85). A conference was recently held with the registrant (L. Cheng, 7/23/86).

DEFICIENCY

1. Define 95 percentile, and show how these values were calculated.
2. Give references (Accession No., date of submission, PP#) for the raw data summarized in the PYDRIN residue data summaries.

REGISTRANT RESPONSE

This submission (No Accession No.) includes a list of petition numbers where the residue data summarized in the previous submission (Accession No. 264097) may be found and the following statement:

"The 95 percent values were derived using a modified variance component analysis."

RCB COMMENT

The list of petition numbers where the residue data may be found is helpful. However, the statement submitted instead of a definition and calculations of "95 percentile." is not helpful. The requested information was needed to determine the appropriateness of the calculation of "anticipated residues." Consequently, RCB cannot review the submission and cannot determine the appropriateness of the calculation of "anticipated residues."

CONCLUSIONS AND RECOMMENDATIONS

The registrant should submit full and complete explanation of how the "anticipated residues" were determined and full and complete calculations of the "95 percentile" used in the tables. We recommend that the registrant be so informed.

cc:R.F., circu, S. Hummel, (W. Greer (TOX), fenvalerate
S.F., fenvalerate amended use file, PMSD/ISB
RDI:EZ:10/21/86:RDS:10/21/86
TS-769:RCB:SVH:svh:RM:810:CM#2:10/21/86