



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

SEP 26 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 352-515. Asana<sup>R</sup> XL 0.66 EC. Revised label. No MRID No. Branch No. 4343.

FROM: Linda S. Propst, Chemist  
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Health Effects Division (TS-769C)

*Linda S. Propst*

THRU: Andrew R. Rathman, Section Head  
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TO: George LaRocca, PM 15  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

E. I. du Pont de Nemours and Company has submitted a revised label for Asana<sup>R</sup> XL Insecticide 0.66 EC, their fenvalerate formulation, in order to equate the uses of Asana<sup>R</sup> XL 0.66 EC with the uses currently registered for another of their fenvalerate formulations, Pydrin<sup>R</sup> 2.4 EC. It is the registrant's intent to have a single es fenvalerate product with all of the fenvalerate agricultural uses on a single label.

Tolerances have been established for residues of the insecticide Cyano(3-phenoxyphenyl)methyl-4-chloro- $\alpha$ -(methylethyl)benzeneacetate in or on numerous raw agricultural commodities at levels ranging from 0.1 ppm for corn (sweet, kernels and cobs) to 20 ppm for turnip tops [40 CFR 180.379 (a)].

The proposed amended revisions with our response to each request follows:

1. The following crops are proposed to be added to the Asana<sup>R</sup> XL label: sugarcane, sunflower, stone fruits, pear (dormant), pear, almonds, filberts, carrots, collards, and snap beans. All of these are crops are currently on the Pydrin<sup>R</sup> label. The registrant also proposes to add radishes to the Asana<sup>R</sup> XL label. The radish use was inadvertently omitted from the Pydrin<sup>R</sup> label.

Our Comments to 1

Since all of the above crops have tolerances established to cover residues of fenvalerate in or on them and all pertinent labeling (application rates, PHI's, etc.) for Asana<sup>R</sup> XL is consistent with those on the Pydrin<sup>R</sup> 2.4 EC label, Dietary Exposure Branch has no objections to adding these crops to the Asana<sup>R</sup> XL label.

2. Caneberries, blueberries (and related bush berries), okra (Florida only), and turnips, currently not on any fenvalerate label, are being added to the Asana<sup>R</sup> XL label. The use directions for these crops are consistent with the use directions in the respective IR-4 petitions on which the tolerances were established.

Our Comments to 2

Dietary Exposure Branch has no objections to adding these crops to the Asana<sup>R</sup> XL label.

3. Except for most orchard uses, the most common minimum recommended use rate has been increased from 0.025 to 0.03 lb a.i./A. Maximum use rates and total active allowed per season are unchanged.

Our Comments to 3

Dietary Exposure Branch has no objections to the registrant increasing the minimum recommended application rate since the maximum application rate and total active allowed per season remain the same.

4. Chinese cabbage (tight-headed varieties) and lentils have been added to the cabbage and dry bean/dry pea labels, respectively.

Our Comments to 4

The new expanded crop definitions listed under 40 CFR 180.1 [FR: 53 (22) 3023, Feb. 3, 1988] include Chinese cabbage under cabbage and lentils under dried peas. Therefore, since tolerances have been established to cover residues of fenvalerate on cabbage and dried peas, the Branch has no objections to the registrant adding Chinese cabbage and lentils to the crops listed on the Asana<sup>R</sup> XL revised label.

Recommendations

Dietary Exposure Branch has no objections to the revised Asana<sup>R</sup> XL 0.66EC label.

cc: Circulation (7), Reading File, Reviewer, Fenvalerate Subject File, PMSD/ISB

RDI: A. R. Rathman, 9/26/88; R. D. Schmitt, 9/26/88

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