



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

DEC 3 1985

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2F2647. Pydrin on Beans. Revised Sections B and F. Letters of October 7 and 29, 1985. No Accession Number. RCB #'s 105 and 149.

From : Sami Malak, Ph.D., Chemist *Sami Malak*  
Tolerance Petition Section III  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

To : George LaRocca/Adam Heyward, PM# 15  
Insecticide-Rodenticide Branch  
Registration Division (TS-767)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

Thru : Philip V. Errico, Head *Philip V. Errico*  
Tolerance Petition Section III  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

The petitioner, Shell Oil Company, responded to the EPA letter of July 29, 1985 (G. LaRocca) and submitted revised Section B and F. The following deficiencies were abstracted from the EPA letter of July 29, 1985.

1. The Agency had approved the following proposed tolerances:

|                  |         |
|------------------|---------|
| beans, succulent | 2 ppm   |
| beans, vine      | 30 ppm  |
| bean vine hay    | 100 ppm |

However, re-examining the feeding studies leads to the conclusion that existing tolerances for meat and milk are not adequate to accommodate the feed items associated with this use. The problem of secondary residues could be

avoided with a feeding restriction. We could approve the proposed tolerance on beans if you would revise Section B to include the following restriction:

"Do not allow livestock to graze treated bean fields. Do not feed treated bean vines or bean vine hay to livestock".

2. Submit a revised Section B by changing the use site from succulent beans to snap beans, since the term succulent beans is not appropriate because 40CFR §180.1(h) defines succulent beans as "All beans in succulent form only". This would include the succulent form of dry beans, for which no residue data are submitted and for which no use is intended.

#### Petitioner's Response to Deficiency #1

The petitioner responded on October 7, 1985 and submitted a revised Section F proposing amending 40CFR §180.379 to include a tolerance of 2 ppm for residues of Pydrin in or on snap beans.

In addition, the petitioner submitted a revised Section B as suggested and imposed the following feeding restrictions:

"Do not allow livestock to graze treated bean fields. Do not feed treated vines or bean vine hay to livestock".

To insure that bean vine hay should not be harvested for introduction into commerce, the feeding restriction should be modified to read "Do not allow livestock to graze treated fields. Do not harvest treated bean vines for livestock forage, fodder or hay".

#### RCB Comments

With the change mentioned above, we can consider deficiency #1 resolved.

#### Petitioner's Response to Deficiency #2

The petitioner responded on October 29, 1985 and submitted a revised Section B proposing changing the use site from snap beans to "Beans, Phaseolus spp".

#### RCB Comments

The term beans includes both dry and succulent beans as per the definition in 40CFR§180.1(h). The term Phaseolus spp. is the scientific name for various species of beans including the immature succulent bean seeds, kidney beans, lima beans, mung beans, pinto beans, snap beans, and wax beans. We have no residue data for beans harvested for the immature succulent bean seed (such as lima beans) to evaluate a requested tolerance on the commodity beans as defined in 40CFR180.1(h). In addition, we

note that a tolerance of 0.25 ppm is currently established under 40CFR§180.379 to cover residues of Pydrin in or on dried beans. This 0.25 ppm tolerance reflects multiple applications at 0.05-0.1 lb act/A/ application for a maximum of 0.8 lb act/A/ year with a PHI of 21 days (PP#OF2399/FAP#OH5270, memo of K. Arne, 2/3/81). The proposed use to beans, Phaseolus spp. in this petition (PP#2F2647), is identical to that in PP#OF2399 except that the PHI is 3 days. In effect, the submitted label amends the proposed use on dry beans to change the PHI from 21 to 3 days. Since we have no residue data to support this change, the petitioner should be advised that the use site and the corresponding PHI's should be distinctively designated as follows:

| <u>Use Site</u> | <u>PHI (days)</u> |
|-----------------|-------------------|
| Snap beans      | 3                 |
| Beans, dry      | 21                |

Deficiencies

1. The petitioner is advised to submit a revised Section B in which the use site and the corresponding PHI's should be distinctively designated as follows:

| <u>Use Site</u> | <u>PHI (days)</u> |
|-----------------|-------------------|
| Snap beans      | 3                 |
| Beans, dry      | 21                |

2. The petitioner is advised to revise the feeding restriction to read "Do not allow livestock to graze treated bean fields. Do not harvest treated bean vines for livestock forage, fodder, or hay".

Recommendations

TOX considerations permitting and pending compliance with the above cited deficiencies, we can recommend amending 40CFR §180.379 to include a tolerance of 2 ppm for residues of the pesticide cyano(3phenoxyphenyl)methyl-4chloro-alpha-(1-methyl) benzeneacetate in or on snap beans.

cc: R.F., Circu., S.Malak, S.F.(pydrin), TOX, EAB, EEB, FDA, P#2F2647, and PM SD/ISB.

RDI:P.V.Errico:11/26/85:R.D.Schmitt:12/2/85.

TS-769:RCB:S.Malak:RM:810:CM#2:X557-7377:11/22/85