



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

PMSH/LSB
1861

OCT 13 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID #CA-870025
[RCB: #2814]
[MRID: None]

Permethrin[AMBUSH®-Insecticide]: 24(c)
on Artichokes in the State of California.

FROM: William L. Anthony
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

William L. Anthony

THRU: *for* Ed Zager, Section Head *L. Cheney*
Special Registration II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: George LaRocca, PM-15
Insecticide-Rodenticide Branch
Registration Division (TS-767)

The ICI Americas, Inc., Agricultural Chemicals Division, has requested a Special Local Need registration under Section 24(c) for the aerial application of the formulation AMBUSH®-Insecticide [EPA Reg. #10182-18], containing the active ingredient [a.i.] permethrin, to control the artichoke plume moth [Platyptilia cardoidactyla] in/on artichokes in the State of California only.

The product formulation contains 25.6% [32 oz.permethrin]/gal with the remaining content as inert material.

A permanent tolerance is established for residues of permethrin[(3-phenoxyphenyl)methyl 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropane carboxylate], and its metabolites 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropane carboxylic acid [DCVA] and (3-phenoxyphenyl)methanol [3-PBA] in/on artichokes at 10 ppm (40 CFR 180.378), [FR, 51, #195(10/8/86) p.36013].

Registered Use

AMBUSH®-Insecticide is registered for ground use on artichoke plants to control plume moths. The product is applied at rates of 0.1 to 0.3 lb a.i. [1.6 oz to 4.8 oz a.i.]/A. Up to five(5) applications per season may be applied with zero(0) day PHI.

Proposed Use

For use on artichokes and in the State of California only. Apply 6.4 oz to 19.2 oz of formulated product [1.6 oz to 4.8 oz a.i.]/A in a minimum of 10 gal water by aerial application. Repeat as necessary to a maximum of five(5) applications with a zero(0) day PHI.

Restrictions

All applicable directions, restrictions, and precautions on the EPA label are to be followed including the label restriction precluding the grazing of livestock in treated areas.

Residue Data

No residue data was submitted with this request for aerial application of the product.

Residue data, collected following ground application, had been previously submitted with PP#4F3114, [Memo: J. Mayes, 10/9/84]:

"Six field residue studies were carried on in CA (two studies at Castroville, and 4 studies at Half moon Bay). The fields were treated with 3-5 applications of permethrin at rates of 0.2-0.3 lb ai/A/application. Artichoke bud samples were collected at 0-21 days PHI.

At the maximum proposed use which allows up to 5 applications of 0.3 lb ai/A with a 0-day PHI, the residues ranged from 1.3 to 5.04 ppm. At PHI's of 1-3 days the residues ranged from 1 to 3 ppm."

The available data, by ground application, are adequate to support the conclusion that residues of permethrin and its metabolites will not exceed the established tolerance of 10 ppm, by aerial application as a result of the proposed use.

Meat, Milk, Poultry, and Eggs

Artichokes are not considered a feed item, therefore RCB does not expect any secondary residues to occur in meat, milk, poultry, and eggs resulting from the proposed use.

An adequate analytical method, via GLC with E.C. detector, is available for enforcement purposes in P.A.M, Vol. II.

Conclusion and Recommendation

RCB has no objection to this 24(c) request for the registration and the proposed use of permethrin, by aerial application, in/on artichokes in the State of California only.

cc: SF[Permethrin];RF;24(c)Permethrin;Circulation;PM#15;PMSD/ISB.
RDI:E. Zager, Sec. Head; L. Cheng 10/7/87; K. Arne, 10/7/87.
RCB/HED: TS-769; W. Anthony; wa; CM#2; Rm. 804, X557-4351; 10/9/87.