



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

PMSD/ISB
1702A

JUL 23 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#4E3146 (No Acc. number) Permethrin (Ambush®) In Or On Avocados and Papayas. Amendment of 6/15/87 (RCB #2566).

FROM: W. T. Chin, Chemist *W. T. Chin*
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Hoyt L. Jamerson, PM #43
Minor Uses Officer
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In a previous review (W. T. Chin, 5/28/87) regarding amendment of 4/7/87 in connection with PP#4E3146, RCB recommended for the establishment of the proposed tolerance for residues of the insecticide permethrin [(3-phenoxyphenyl)methyl-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate] and its metabolites 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid (DCVA) and (3-phenoxybenzyl)methanol (3-PBA) in or on the raw agricultural commodities avocados and papayas at 1.0 ppm pending the two deficiencies identified in W. T. Chin's 5/28/87 memo.

In response to the deficiencies identified above, the petitioner, Dr. G. M. Markle (National Coordinator, IR-4), submitted a revised Section B for avocado and papaya labels dated 6/15/87 to H. L. Jamerson (EPA). The deficiencies identified above are restated below, followed by the petitioner's response and RCB's comment/conclusion.

Deficiency No. 1

Add "Note: 6.4 oz of product = 0.1 lb a.i." to the avocado label.

The Petitioner's Response to Deficiency No. 1

The revised Section B of avocado label includes: "Note: 6.4 oz of product = 0.1 lb a.i."

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency No. 1

RCB concludes that deficiency No. 1 has been adequately resolved.

Deficiency No. 2

Rearrange the RATE OF AMBUSH® shown in the papaya label as follows:

<u>lbs a.i./A</u>	<u>fl. oz/A</u>	<u>fl. oz/100 gal¹/</u>
0.2	12.8	6.4

The Petitioner's Response to Deficiency No. 2

The RATE OF AMBUSH® shown in the papaya label is rearranged as follows:

<u>lbs a.i./A</u>	<u>fl. oz/A</u>	<u>fl. oz/100 gal¹/</u>
0.2	12.8	6.4

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency No. 2

RCB concludes that deficiency No. 2 has been adequately resolved.

RECOMMENDATION

TOX considerations permitting, RCB recommends for the establishment of the proposed tolerance for residues of the insecticide permethrin and its metabolites DCVA and 3-PBA in or on the raw agricultural commodities avocados and papayas at 1.0 ppm.

cc: Circu., R.F., S.F., EAB, PP#4E3146, EEB TOX, PM#43, W.T.Chin, and PMSD-ISB
RDI: P.V.Errico(7/20/87): R.D.Schmitt(7/20/87)
TS-769: RCB: CM#2: RMB12:557-4352: W.T.Chin:wc(7/21/87)