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Doherty
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Date Out EFB: JUL 9 1980

To: Product Manager Critchlow
TS-767

From: Dr. Willa Garner
Chief, Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 80-FL-4, 80-FL-5, 80-Fl-6, 80-FL-7

Chemical: Permethrin

Type Product: Insecticide

Product Name: Ambush or Pounce

Company Name: ICI Americas or FMC

Submission Purpose: Section 18's for use on cabbage tomatoes, celery and lettuce

ZBB Code: Section 18

ACTION CODE: 510 on all

Date in: 6/20/80

EFB # 498 - 501

Date Completed: JUL 9 1980

Deferrals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

1. INTRODUCTION

1.1 The registrant requests a section 18 registration (exemption from provisions of FIFRA) for the use of permethrin on cabbage, tomatoes, celery and lettuce.

1.2 The proposed period of this emergency use is July 1, 1980 through June 30, 1981. Products involved are Ambush (reg. no. 10182-3) and Pounce (reg. nos. 279-3024 and 279-3014). Labels were not supplied.

2. DIRECTIONS FOR USE

2.1 Lettuce (Florida) - Apply 0.1 - 0.2 lb ai/A on a 5 day schedule to a maximum of 10 applications. There is an estimated total of 12,000 acres of lettuce to be treated in the counties of Palm Beach, Hillsboro, Hendry, Collier, Orange, Seminole, Highland and Sarasota

2.2 Celery (Florida) - Apply 0.05 - 0.2 lb ai/A per application with a maximum of 3 lb ai/A to be applied per year. There is an estimated total of 11,000 acres of celery to be treated in the counties of Palm Beach, Orange, Seminole and Sarasota.

2.3 Tomatoes (Florida) - Apply 0.05 - 0.1 lb ai/A per application to a maximum of 10 aplications every 5-7 days. There is an estimated total of 40,000 acres of tomatoes to be treated in the 4 production areas of Dade, Ft. Pierce - Pompano, Southwest and Palmetto - Puskin. Also included are Gadsden County and Quincy, Florida.

2.4 Cabbage (Florida) - Apply 0.05 - 0.1 lb ai/A per application on a 5 - 10 day schedule to a maximum of 10 aplications. There is an estimated total of 20,000 acres of cabbage to be treated in Florida.

2.5 These use directions stipulate the following maximum ai poundages to be applied during this proposed 12-month section 18: lettuce - 24,000 pounds, celery - 33,000 pounds, tomatoes - 40,000 pounds and cabbage - 20,000 pounds.

3. DISCUSSION OF DATA

3.1 No data were submitted.

4. RECOMMENDATIONS

4.1 Our review of 10182-18 dated August 27, 1979 concurred with the use of Ambush on broccoli, brussels sprouts, cauliflower and sweet corn with a 60-day rotational crop restriction.

4.2 Our review of 10182-RI dated September 6, 1978 concurred with the use of Ambush on soybeans and tomatoes with a 60-day rotational crop restriction.

4.3 We concur with this proposed section 18 (cabbage, tomatoes, celery and lettuce) with the 60-day rotational crop restriction as on the cotton label.

4.4 We would not concur with an extension of this section 18 beyond June 30, 1981, without a response to the recommmendations in our review of 10182-RI dated July 31, 1978.

Samuel M. Creeger July 9, 1980

Samuel M. Creeger
Review Section #1
EFB/HED