Date Out of EFGWB:
JAN 17 1989
To: George T. LaRocca Product Manager # 15 Registration Division (TS-767)
Prom: Paul Mastradone, Ph.D., Acting Chief Environmental Chemistry Review Section I Environmental Fate and Ground Water Branch Environmental Fate and Effects Division (75-769-C) THRU: Henry Jacoby, Acting Chief
THRU: Henry Jacoby, Acting Chief MW Environmental Fate and Ground Water Branch (TS-769C)
Attached, please find the EAB review of
Reg./File # : 618-OI
Chemical Name: Avermectin
Type Product : Insecticide/miticide
Product Name : AGRI-MEK 0.15 EC
Company Name : MERCK
Purpose : EXPEDITE REVIEW of field dissipation study to support use on
cotton, citrus, woody ornamentals, celery, and tomatoes.
Date Received: 12/8/88 Action Code: 181
Date Completed: EFGWB#(s): 90227, 90225
Total Reviewing Time (decimal days): 3.5
Deferrals to: Ecological Effects Branch, EFED
Science Integration & Policy Staff, EFED
Non-Dietary Exposure Branch, HED
Dietary Exposure Branch, HED
Toxicology Branch, HED

Shaughnessy No.: 122804

1. CHEMICAL:

Common Name- abamectin (active ingredient)

Chemical Name- avermectin

Trade Name- AGRI-MEK 0.15 EC

Chemical Structure-

- 2. TEST MATERIAL: Abamectin 0.15 EC formulation.
- 3. STUDY/ACTION TYPE: The registrant requests an EXPEDITE REVIEW of a field dissipation study of abamectin/avermectin Bla and its delta 8,9 isomer in support of registration on cotton, citrus, woody ornamentals, celery, and tomatoes. See attached memo of 12/14/88 from Anne Lindsay.

4. STUDY IDENTIFICATION:

- Norton, J.A. 1988. Soil leaching/soil dissipation study for abamectin 0.15 EC miticide/insecticide, Field trial summary for Merck Test No. 001-87-6045R, Merck and Co., Agricultural Research and Development, Three Bridges, NJ, Accession #409271-01.
- Tway, P.C. and P.G. Wertz. 1988. Soil residue chemistry data in support of applications for registratiion of abamectin, Merck No. 001-87-6045R, ADC No. 992, Accession #409271-02.

5. REVIEWED BY:

Herbert L. Manning, Ph.D. Microbiologist, EFGWB/EFED

Signature: Herbod J. Hanny Date: JAN 17 1989

6. APPROVED BY:

Paul J. Mastradone, Ph.D. Acting Chief, Section 1, EFGWB/EFED

Signature: Paul J Markoslow

7. CONCLUSION:

The study is unacceptable at this time, since it is incomplete and is really an interim report. The data submitted were from "selected representative samples from one replicate." Data from the other three replicates will be reported at a later date.

Based upon the limited data provided, avermectin B_{1a} and delta 8,9 isomer did not leach below the 0-6 inch core depth after 10 applications at the maximum rate (0.02 lb ai/A) of 0.15 EC formulation. The reviewer-calculated half-life was 40 days. Residues declined from 8.15 ppb on day 0 to 1.65 ppb on day 90, posttreatment of 10 applications. Residues were not identified.

8. RECOMMENDATION:

The results of analyses of the three remaining soil core replicates should be submitted, as well as half-life calculations and decline curves for $\underline{\text{all}}$ the data.

9. BACKGROUND:

- A. Introduction—
 The submission of this action to EFGWB is the result of a memo from Anne Lindsay (Registration Division) requesting an EXPEDITED REVIEW of a field leaching study to meet the first-time, food/feed uses of avermectin on cotton/citrus and the upcoming, spring growing season.
- B. <u>Direction for Use</u>
 A proposed label for the new uses on cotton and citrus was not included in the submission; however, the reviewed dissipation study indicates the maximum use is 0.02 lb ai/A using a 0.15 EC formulation.

10. DISCUSSION OF INDIVIDUAL STUDY:

See separate DATA EVALUATION RECORD.

- 11. COMPLETION OF ONE-LINER: Not applicable. Data was of an interim nature.
- 12. CBI APPENDIX: There is no CBI in this submission.

DATA EVALUATION RECORD

Norton, J.A. 1988. Soil leaching/soil dissipation study STUDY IDENIFICATION: for abamectin 0.15 EC miticide/insecticide.

REVIEWED BY:

Herbert L. Manning, Ph.D. Microbiologist, EFGWB/EFED

APPROVED BY:

Paul J. Mastradone, Ph.D. Acting Chief, Section 1, EFGWB/EFED

Signature: Herbord Manning

JAN 17

Signature: Paul Markadone

Date:

TYPE OF STUDY: Terrestrial Field Dissipation

CONCLUSIONS:

- 1. The study amounts to an interim report and is incomplete; the data submitted only covered selected samples from one of the four replicates. The study is unacceptable at this time, pending receipt of the data from the other three soil replicates.
- 2. Avermectin Bla/delta 8,9 residue did not leach below 0-6 inch soil depth after 10 applications at the maximum rate of 0.02 lb ai/A of 0.15 EC (total of 200 ppb) to sandy loam soil. Sampled immediately after the 10th application (0 day), avermectin residue was 8.15 ppb in 0-6 inch segment; at 28 days it was 4.25 ppb, at 60 days it was not quantifiable (<1 ppb), and at 90 days it was 1.65 ppb. Reviewer-calculated half-life, as determined by regression analysis, was 40. days (statistics and plot attached). No attempt was made to idenfify residues.

MATERIALS AND METHODS:

Ten weekly applications of 0.15 EC at the maximum rate of 0.02 lb ai/A (a total of 200 ppb) were made on celery growing in sandy loam soil (<1.25% OM). Plans to test celery for residues were abandoned because of poor development (4-5 inches). Soil cores were taken 0-12 inches before treatment and after each treatment, as well as after the 10^{th} treatment on days 1, 3, 7, 14, 28, 42, 60, 90, and 120. From day 28 to 120, additional cores were taken to cover 12-24 and 24-36 inch depths. The celery was a UTAH variety and the treated plot (0.17 acres) was located in Tulare County, CA. Watering of the plot was by Whirly-Bird orchard sprinklers and rainfall. The plot received a total of 24.96 acre inches of water. Collected core samples were frozen at <10°C and extracted within one month. Extraction of the soil was by acetonitrile:deionized water (1:1) and analysis for avermectin Bla and its delta 8,9 isomer was by High Performance Liquid Chromatography (HPLC). Recovery of avermectin from fortified samples ranged from 81-100%.

REPORTED RESULTS:

Table I summarizes the data from the "selected representative samples from one replicate." These data indicate the lack of movement of avermectin below 0-6 inches and its gradual dissipation from day 0 (8.15 ppb) through day 28 (4.25 ppb) to day 90 (1.65 ppb). Table II shows the recovery data. Soil characteristics of the core segments (0-12, 12-24, 24-36, and 36-48 inches) are also presented.

DISCUSSION:

- 1. The study amounts to being an interim report (and therefore an incomplete study), because the data submitted was only from selected samples of one of the four soil core replicates. Acceptance of the study will depend upon review of the remaining data.
- 2. Neither half-life determinations nor residue decline curves were provided. A regression analysis of the data was performed and yielded a half-life of 40 days (correlation coefficient squared = 0,98). The statistics and a semi-log plot of the data are attached.
- 3. If the soil core samples have been stored frozen for more than one month, than storage stability data should be included with the data on the other replicates.

MEMORANDUM

Request for Expedited Review of Petitions for SUBJECT:

408 and 409 Tolerances and Section 3 Registration

for Use of Avermectin B₁ and its Delta 8, 9-Isomer on Cotton, and Citrus (PP7F3500 and

PP8F3592)

Anne E. Lindsay, Acting Director FROM:

Registration Division (TS-767C)

William L. Burnam, Acting Director TO:

Health Effects Division (TS-769C)

and Anne L. Barton, Deputy Director

Environmental Fate and Effects Division (TS-769C)

On February 23, 1987 and December 7, 1987 Merck & Company, Inc. petitioned permanent tolerances and Section 3 registration for use of Avermectin B1 and its delta 8, 9-isomer (AVM) on cotton and citrus respectively.

The major issues that need resolution are the characterization of the residues in animals; the characterization, identification and submission of toxicity data on the polar fraction of the residue in plants; additional field leaching studies and additional data on adverse effects to mammals and aquatic invertebrates. In an attempt to resolve these issues Merck & Company has submitted, in the last several months, data and/or rationale they believe addresses these issues and satisfies outstanding data requirements.

Since cotton and citrus are first time food/feed uses and the use season for these crops begins in early Spring, I am requesting your assistance in expediting DEB, TOX/IR, EFGWB and EEB reviews by January 24, 1989. I would

appreciate your cooperation in meeting this schedule. Attached are the pertinent submission record numbers for the information/Mata that is currently under review.

Attachment

RD A Heyward CG 12 8 88 X4421

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REGRESSION ANALYSIS OF RESIDUE DECLINE DATA

NAME: H.L. MANNING

DATE: 1/9/89

TITLE: FIELD DISSIPATION, AVERMECTIN, HALF-LIFE DETERMINATION, 0-6 inch depth

REMARKS: SEE TITLE

Bla/delta 8,9

FILE NAME: AVERME

RESIDUE LEVELS IN PPB

INTERVALS IN DAYS

DATA ENTRIES 1 TO 3

8.15 at 0 DAYS

4.25 at 28 DAYS

1.65 at 90 DAYS

N= 3 SUM X= 118 SUM X†2= 8884 SUM Y= 4.04571 SUM Y†2= 6.74603 SUM X*Y= 85.5835 For the 95% confidence level, the appropriate 't' VALUE=6.3034 (For a one tailed test)

DF=1 CORRELATION COEFFICIENT=.99412 CORRELATION COEFFICIENT SQUARED=.988274
Y-INTERCEPT= 2.03043 RELATIVE % ERROR OF THE SLOPE= 10.9% % LOSS PER DAY= 1.72%

SLOPE -.017, its UPPER 95% CL= -.005 and its LOWER 95% CL= -.029

(HALF LIFE 40 DAYS, its UPPER 95% CL= 127.6 DAYS and its LOWER 95% CL= 23.7 DAYS

DAY ZERO LEVEL=7.617 PPB, its UPPER 95% CL=20.92 PPB and its LOWER 95% CL=2.774 PPB

FIELD DISSIPATION, AVERMECTIN, HALF-LIFE DETERMINATION, 0-6 inch depth

SEE TITLE

(...=UPPER 95% CON. LIMIT)

