PC129099 2-6-96 R.F.

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

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OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

SECTION 18 EXEMPTION FOR USE OF **IMIDACLOPRID (PROVADO®)** ON **SPINACH**

To: M. Johnson/M. Collantes, PM Team 41 (7505W)
From: F. Griffith, CBTS (7509C)

ID#: 96CA0019
DP Barcode: D222380
CBTS#: 16766
Chemical
EPA Approved Common Name: *Imidacloprid*
Chemical Name: 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine
Formulation Trade Name: Provado® 1.6 F
Registration#: 3125-457
Class: Insecticide
State or Agency applying for exemption: California Environmental Protection Agency, Dept of Pesticide Regulation
Type of exemption: SPECIFIC
Reason To control the green peach aphid on approx. 460 acres in Imperial and Riverside counties in California.

RECOMMENDATION

TOX considerations permitting, CBTS has no objection to the issuance of this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated spinach in inter-state commerce.

CONCLUSIONS

1. The metabolism of imidacloprid in/on tomatoes, eggplant, apples, potatoes, and corn is adequately understood. The residues of concern are imidacloprid and its metabolites containing the 6-chloropyridinyl moiety. The metabolism data are translated to spinach.

2. The metabolism of imidacloprid in/on ruminants and poultry is adequately understood. The residues of concern are imidacloprid and its metabolites containing the 6-chloropyridinyl moiety. Spinach is not considered to be livestock feed item.

3. Common moiety and compound specific residue analytical methods are available from EPA for the enforcement of the current tolerance expression.

4. Analytical reference standards for imidacloprid, and its olefin, hydroxy, guanidine, and 6-CNA metabolites are available from the Pesticides Repository at RTP, NC.

5. CBTS anticipates that residues of imidacloprid and its metabolites containing the 6-chloropyridinyl moiety are not likely to exceed the following levels as a result of the proposed use:

spinach 3.5 ppm

6. The residue data used in the evaluation of this Section 18 request were generated by Bayer Corporation in their Stilwell, KS, laboratories.

A Comparison of Proposed Section 18 Label and the Imidacloprid Use in Generating Crop Field Trial Residue Data Used in CBTS's Decision

	Proposed Use	Residue Data
Chemical	Imidacloprid	Imidacloprid
Formulation	Provado® 1.6 F	Admire® 2 F
Crop	Spinach	Cabbage, broccoli, cauliflower; head and leaf lettuce
Method of application	air (5 gal water/A) or ground (20 gal water/A) foliar spray	1 soil + 2 ground foliar sprays
# of applications	5	3
Timing	1st spray before damaging population is established, 5-7 day repeat application interval as needed.	1st spray before damaging population is established, 5 day repeat application interval.
Rate/application	3.75 fl ozs or 0.047 lb a/A.	0.73 lb ai/A (1.46X)
Rate/year or season	18.75 fl ozs (1.17 pts) or 0.235 lb ai/A/season as foliar spray: max. 0.5 lb ai/A from all sources.	0.5 lb ai/A/season
Maximum residue	N/A	Broccoli 2.25 ppm, Cabbage 1.75 ppm, Cauliflower 0.39 ppm; Head lettuce w/ wrapper leaves 2.13 ppm, and leaf lettuce 2.49 ppm.
Restrictions	7 day PHI.	7 days PHI. Do not apply to vegs. grown for seed.

Residue data taken from: Bayer crop field trial data filed with PP# 3F4231 (see memo by F. Griffith dated 6/22/94).

ADDITIONAL INFORMATION: CBTS recommended for a total imidacloprid tolerance on the leafy vegetables crop group leafy greens subgroup (includes spinach) at 3.5 ppm (see PP# 5F4522).

cc:R.F.,Circ.,Sec.18File,Reviewer(FDG),DRES(R.Griffin).
7509C:CBTS:Reviewer(FDG):CM#2:Rm804Q:305-5826:FDG:2/3/96.
RBI:BrSrSci:RALoranger:2/5/96:ActBrCh:EZagerZ:2/6/96.