



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

OCT 8 1992

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Petition for Exemption for the Requirement of a Tolerance for Azadirachtin Applied to Seeds, Cuttings, Transplants and Plants (DP Barcode: D173864; I.D. No. 2F04046; HED Project No. 2-1402; Submission No. S410740)

TO: Willie Nelson/Phil Hutton
Insecticide-Rodenticide Branch
Registration Division (H7505C)

FROM: J. Thomas McClintock, Ph.D., Microbiologist
Biological Pesticide Section
Science Analysis Branch
Health Effects Division (H7509C)

JTM
10/11/92

THROUGH: Roy D. Sjoblad, Ph.D, Acting Section Head
Biological Pesticide Section
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Health Effects Division (H7509C)

R.D. Sjoblad
10/7/92

ACTION REQUESTED: AgriDyne Technologies, Inc. (formerly NPI) has requested an exemption from the requirement of a tolerance for AZATIN, a azadirachtin-based product, for use on seeds, cuttings, transplants, and plants. The application rate is equal to or less than 20 grams a.i./acre/application.

CONCLUSION: SAB supports the petition for an exemption from the requirement of a tolerance for azadirachtin on the proposed food and feed crops when applied at rates equal to or less than 20 grams a.i./acre. The mammalian toxicology data developed from Tier I testing supports the tolerance exemption at these low application rates. Because of the low mammalian toxicity and low application rates, residue data is not required.

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