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DP Barcode : D176448  
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EEB Out : APR 15 1992

To: LINDA PROPST PM73  
Product Manager  
Special Review and Reregistration Division (H7508W)

From: Douglas J. Urban, Acting Chief  
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : \_\_\_\_\_  
Chemical Name : BENOMYL  
Type Product : \_\_\_\_\_  
Product Name : BENLATE DF  
Company Name : \_\_\_\_\_  
Purpose : PROVIDE FOOTNOTE FOR REQUIRED PLANT TESTING  
THAT WAS INDICATED IN A MARCH 10, 1992 MEMO FROM EEB TO SRRD

Action Code : 604 Date Due : 4-22-92  
Reviewer : DAN RIEDER

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

| GDLN NO | MRID NO | CAT | GDLN NO | MRID NO | CAT | GDLN NO  | MRID NO | CAT |
|---------|---------|-----|---------|---------|-----|----------|---------|-----|
| 71-1(A) |         |     | 72-2(A) |         |     | 72-7(A)  |         |     |
| 71-1(B) |         |     | 72-2(B) |         |     | 72-7(B)  |         |     |
| 71-2(A) |         |     | 72-3(A) |         |     | 122-1(A) |         |     |
| 71-2(B) |         |     | 72-3(B) |         |     | 122-1(B) |         |     |
| 71-3    |         |     | 72-3(C) |         |     | 122-2    |         |     |
| 71-4(A) |         |     | 72-3(D) |         |     | 123-1(A) |         |     |
| 71-4(B) |         |     | 72-3(E) |         |     | 123-1(B) |         |     |
| 71-5(A) |         |     | 72-3(F) |         |     | 123-2    |         |     |
| 71-5(B) |         |     | 72-4(A) |         |     | 124-1    |         |     |
| 72-1(A) |         |     | 72-4(B) |         |     | 124-2    |         |     |
| 72-1(B) |         |     | 72-5    |         |     | 141-1    |         |     |
| 72-1(C) |         |     | 72-6    |         |     | 141-2    |         |     |
| 72-1(D) |         |     |         |         |     | 141-5    |         |     |

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but additional information is needed)

S=Supplemental (Study provided useful information but Guideline was not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur



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

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

APR 15 1992

SUBJECT: Footnote for Plant Testing for Benlate DCI

FROM: Douglas J. Urban, Acting Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division H7507C

TO: Linda Propst PM73  
Reregistration Branch  
Special Review and Reregistration Division H7508W

The EEB has requested plant testing for Benlate DF because of a series of significant phyto-toxicity incidents and because Benlate is applied by air and sprinkler irrigation systems. The following footnote should accompany the DCI relative to plant testing. Note that according to the March 10, 1992 memorandum from Douglas Urban, EEB is only requiring TIER I testing (122-1 and 122-2) for Benlate DF. Tier II tests (123-1a, 1b and 2) are not being required at this time.

122-1(a) Seed Germination/Seedling Emergence (ten species)<sup>1</sup>

122-1(b) Vegetative Vigor (ten species)<sup>1</sup>

122-2 Aquatic Plant Growth (5 species)<sup>1</sup>

If you have questions, please contact Dan Rieder.

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1/ Testing is required using Benlate DF because it is applied by air or sprinkler irrigation system and because of serious incidents of phyto-toxicity caused by this formulation.

7/9/92

Dave

The only things that are different are that we are asking for testing on the TEP not T&AI and we are asking for the complete nontarget plant data base for a fungicide. We usually only ask for a Sclerotium study for a fungicide.

Charlie

7-7-92

Charlie:

I got a call from Suzanne Cerelli (SRRO) asking if there is anything "special" \* about the testing we are requesting on Benlate DF. I told her I didn't think so, but said I would double check. Let me know.

\* ~~Species~~ different than in SE etc. Thanks

I called Suzanne C. 7-9-92 and left msg. that there was nothing special about this testing other than that we usually do not ask for tests w/ TEP and full compliment of plant tests w/ Fungicide. This is a special case.