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

5/1/74

Conversation Don Lamb
(913) 681-2451
Concerning data request
on 3125- E14, E16, E14, E1A
3F 1399.

Chemagro will do some simulated
field testing to answer the
request.

Field monitoring will not be done.

I pointed out to Don that my
request would be consistent with
a permit review. — Chemagro never
had a permit. Herein lies the problem

Alkerman — place tight label restrictions
and possible limitations until sufficient
data are available to support
safe use. Monitor data seem-
to be the way around limitation. JWA

Division of Baychem Corporation

Kansas City, Mo. 64120

Mr. Charles L. Smith
Acting Assistant Director
Registration Division (HM-547)
Environmental Protection Agency
Waterside Mall, East Tower
Washington, D.C. 20460

P.O. Box 4913
Hawthorn Road
Cable: Kemagro Kansas City
Telephone: 816/483-4250

April 24, 1974

Subject: NEMACUR 3 Emulsifiable Nematicide
NEMACUR 15% Granular Nematicide
EPA File Symbols 3125-EXP-X
Your letter of April 5, 1974

DR. DON LAMB
913 681-2451

Dear Mr. Smith:

The following is submitted in reply to your letter of April 5, 1974 regarding subject experimental permits:

1. Your request for field monitoring studies to determine possible hazard to birds and other wildlife was discussed with Mr. James Ackerman of your Division. It was concluded that:
 - (a) Size of trees, ground cover and size of plots planned for efficacy and phytotoxicity studies will not provide meaningful detailed data on wildlife.
 - (b) Only the granular formulation will be evaluated for hazard to birds.
 - (c) The following alternative proposal is a reasonable method to collect the required data:

Gross observations will be made at all sites of application to determine if there is an obvious decrease in bird activity or if mortality occurs from the recommended application of NEMACUR. Reports of these observations will include the number of observations made, the relative abundance of birds on or near the plot and any significant effects on other wildlife species. Caged bird studies and possibly small field studies will be conducted at our Chemagro Research Farm, Stanley, Kansas. These studies will be on small plots adjacent to orchards or wooded lots where resident birds are present in sufficient numbers to yield meaningful results.

Mr. Charles L. Smith
EPA, Washington, D.C.

April 24, 1974
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At the completion of the majority of field applications and the studies conducted at our research farm, Mr. Ackerman will be consulted and presented with a progress report of the available data. If it is then determined that a field monitoring study is still necessary, it will be conducted concurrently with the California efficacy studies from November, 1974 to February, 1975. This will complete the collection of wildlife data under the proposed experimental program.

2. Corrected copies of labeling for NEMACUR 3 indicating the amount of water to be used for the broadcast applications were hand carried to the Coordination Branch on April 17, 1974.

Revised copies of Section F specifying the acreage to be treated in the New England states (Connecticut and New Hampshire) were also hand carried to the Coordination Branch on April 17, 1974.

Your request for additional data to be provided prior to registration is noted and will be acted upon accordingly.

We trust the above will allow you to approve this Experimental Permit as quickly as possible.

Yours very truly,

CHEMAGRO Division of Baychem Corporation

G. E. Brussell
G. E. Brussell, Manager
Registrations
Research & Development

GEB:brh

*Mr Brussell's comments are
consistent with my discussion
to Don Lamb April 24, 1974*

NAC 4-25-74 Jwa