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RECORD NO.

SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: 3-27-89 OUT 3/28/89

FILE OR REG. NO. 3125-283
PETITION OR EXP. NO. _____
DATE OF SUBMISSION 3-13-89
DATE RECEIVED BY HED 3-24-89
RD REQUESTED COMPLETION DATE 4-10-89
EEB ESTIMATED COMPLETION DATE 4-10-89
RD ACTION CODE/TYPE OF REVIEW 655

TYPE PRODUCT(S) : I, D, H, F, N, R, S Insecticide/Nematicide
DATA ACCESSION NO(S). _____
PRODUCT MANAGER NO. S. Lewis(21)
PRODUCT NAME(S) Nemacur (Fenamiphos)

COMPANY NAME Mobay Corporation
SUBMISSION PURPOSE Registrant response concerning previous
EEB meetings with the Registrant relative to
field study data requirements.

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION % A.I.

4 pages w/ attachment (2 pages)

ECOLOGICAL EFFECTS BRANCH (EEB)

Chemical: Fenamiphos

100.0 Submission Purpose

On March 1, 1989, the EEB (Dick Felthousen and Ed Fite) met with representatives from Mobay Chemical Corporation (David Fischer and John Thornton) to clarify existing avian field study requirements in light of the numerous label changes made by the Registrant since the Fenamiphos Standard had been issued. This meeting was also the result of a previous meeting held on February 1, 1989. Also in attendance was Sydney Jackson from the Registration Division.

On March 16, 1989, the EEB received a copy of Mobay's follow-up letter to the March 1 meeting. Upon reading the letter both Ed Fite and Dick Felthousen agreed that Mobay's account of the meeting and the subsequent data requirements specified in the letter were not what EEB had determined were now required. Accordingly, the EEB immediately notified Sydney Jackson of the discrepancy and requested that the Registration Division request a formal EEB response to the Registrant's letter.

101.0 Discussion

The Registrant claims that, as a result of the last meeting, the following studies are now required for 1989-90 only from the southeastern part of the United States:

1. A level 1 study with NemaCur 3 EC on golf courses.
2. A level 1 study with NemaCur 3 EC in tobacco.
3. A level 1 study with NemaCur 15% granular in citrus.

The Registrant further claims that, "there is a possibility that a level 2 study with NemaCur 3 EC in citrus and a level 1 study with NemaCur 10% Turf and Ornamental Nematicide may be required in the future."

The EEB agrees with the 3 Level 1 studies identified by the Registrant but does not concur with their statement relative to the data requirement for the Level 2 citrus study or the NemaCur 10% Turf and Ornamental study on golf courses. The EEB has previously specified in the Standard that a level 2 study in citrus would be required to support reregistration. In addition, the EEB, at the February 1, 1989, meeting, informed the Registrant that they would be required to conduct the turf study according to label directions. The Registrant told EEB that under normal use practice NemaCur 3 EC was used to control mole crickets on fairways whereas the NemaCur 10% was typically used on tees and greens. EEB remarked

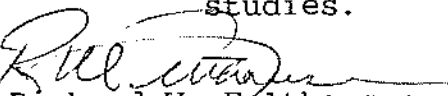
that if this were the case, the label should be modified accordingly (Note: the current label makes no differentiation between what can be applied to either the greens or fairways). The Registrant informed the EEB that, for marketing purposes, they did not want to specify this on the label. The EEB told the Registrant that they would then have to conduct a study using the Namacur 3 EC on the fairways as well as a study using the Namacur 10% on the tees and greens and, based on the results of these studies, the Registrant may also be required to conduct a study using both of the formulations at the same time.

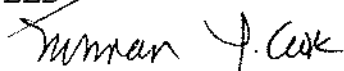
102.0 Conclusions

In summary, based on meetings with the Registrant and changes to registered labels since the issuance of the Reregistration Standard, the EEB has identified the following studies to satisfy the data requirements for reregistration of Namacur:

1. A level I study with Namacur 3 EC on golf courses. Specifically, this formulation will be used on fairways and will be water incorporated.
2. A level I study with Namacur 3 EC on tobacco. Specifically, this formulation will be mechanically incorporated.
3. A level I study with Namacur 15% granular in citrus. Specifically, this formulation will be mechanically incorporated.
4. A level I study with Namacur 10% on golf courses. Specifically, this formulation will be water incorporated and will be a follow-up study to the Namacur 3 EC study.
5. A level II study using Namacur 3 EC in citrus. Specifically, this formulation will be applied as a band treatment (i.e., along the drip line of the tree) and will be water incorporated.

In addition, the EEB reserves the option to require additional field testing pending the results of these studies.

 3/28/89
Richard W. Felthousen, Wildlife Biologist
EFED/EEB

 3.28.89
Norm Cook, Head-Section 2
EFED/EEB

A handwritten signature in black ink, appearing to read "Jim W. Akerman", with a long horizontal flourish extending to the right.

Jim Akerman, Chief
EFED/EEB

Mobay

FILE



Mobay Corporation
A Bayer USA INC. COMPANY



Agricultural Chemicals Division

adhes. file

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March 13, 1989

Subject: Reregistration of NEMACUR® Fenamiphos Insecticide-Nematicide
Avian Field Study Meetings with the EPA

Dear Ms. Lewis:

This letter is in follow-up to two recent meetings between Mobay and the Agency concerning avian field study requirements for the reregistration of NEMACUR.

The first meeting was held February 1, 1989 at EPA offices in Arlington, Virginia. Those attending the meeting were Ed Fite and Dick Felthausen of EEB, Gary Booth, Lou Best and Robert Whitmore of Environmental Labs Inc., and David Fischer of Mobay. After discussing the Agency's requirements which include broadcast studies on tobacco, citrus and turf and one granular band study on citrus, it became evident that the Agency was requiring studies on some use patterns which were no longer registered (broadcast granular applications on citrus and tobacco) and that EEB was not familiar with the NEMACUR reregistration labels which the Agency had approved with Lois A. Rossi's letters of 10/21/88. This resulted in the need for another meeting with the EPA on March 1, 1989.

The March 1, 1989 meeting held to clarify existing avian field study requirements and to decide which replacement studies would be required. Those attending the meeting included Dick Felthausen, Ed Fite and Sid Jackson of EPA and David Fischer and John Thornton of Mobay.

After considerable discussion, EPA accepted the fact that Mobay had revised the NEMACUR labels and that some of the earlier field study requirements were no longer appropriate. As a result, the following studies are now required for 1989-90 only from the southeastern part of the United States:

- 1. A level 1 study with NEMACUR 3 EC on golf courses.
- * { 2. A level 1 study with NEMACUR 3 EC in tobacco.
- 3. A level 1 study with NEMACUR 15% Granular in citrus.

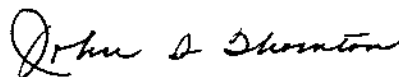
*D. Felthausen on 3-21-89 - Don't agree with all - need Bann sheet w/ll
Review & Clarify/Response 1

It was decided that the NEMACUR 3 EC study on golf courses would cover all turf uses for NEMACUR 3 EC and NEMACUR 10% Turf and Ornamental Nematicide for the present time. The NEMACUR 3 EC study in tobacco would cover all field crop NEMACUR 3 EC uses with mechanical incorporation. The NEMACUR 15% Granular study in citrus would cover all granular uses in orchards and field crops.

* It was also stated at the meeting that there is a possibility that a level 2 study with NEMACUR 3 EC in citrus and a level 1 study with NEMACUR 10% Turf and Ornamental Nematicide may be required in the future.

Yours very truly,

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION



John S. Thornton, Manager
Registrations
Research and Development

JST:MKT:brh