UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

12 DEC 1977

DATE:

SUBJECT: Memorandum of Discussion - Environmental Chemistry Data Submitted in Support of Registration of Funginex, EPA Reg. No. 21137-4

FROM: Eugene M. Wilson, PM 21 Eugene M. Wilson

TO: Subject File, Environmental Chemistry Section, Efficacy and Environmental Effects Branch

A meeting was held at the request of the E. M. Laboratories, Inc. to discuss this Agency's review and evaluation of the environmental chemistry data submitted in support of an amendment of the subject registration, which added new use patterns for control of foliar and fruit diseases of blueberries and peaches. The following people participated in this meeting:

E.M. Laboratories, Inc.
- Larry Miller
- Andre Knoll
- Stephen D. Pouliot

EPA - Registration Division - OPP
- Arthur Schlosser
- Samuel M. Creeger
- Robert F. Carsel
- Eugene M. Wilson

1. Soil dissipation

EM Laboratories had submitted soil dissipation studies conducted in Germany on three soil types: heavy, medium and light soils. They observed that 90 percent of the triforine applied to the surface of the soil had dissipated within 12 weeks from date of application. Other exemplary tests conducted in New York on soil dissipation were reported and cited in this application. Arthur Schlosser indicated that the EM Laboratories, Inc. must submit an argument that the data submitted are adequate to indicate the soil dissipation of triforine in soils associated with the new use-patterns under this application. I believe this message was also conveyed to EM Laboratories during their telephone discussions with Mr. Ronald Ney.

2. Effects of Triforine on Microbes

Details on conducting tests to define the effects of triforine on nitrogen fixation and starch and protein degradation were discussed. Robert Carsel indicated that the protocols of these tests should be reviewed by this Agency prior to conducting the tests. Alternatives in conducting these tests were discussed. These appeared to be repetitious of what we had conveyed in our formal communication on the environmental chemistry deficiencies, our letter to E.M. Laboratories, Inc., October 28, 1977.

I believe that this meeting served the purpose of making clear as to what alternatives were available for this Registrant.

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