



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

Cas. No. ~~5777A~~

594A

SECTION HEAD
CASWELL FILE

MEMORANDUM

6/25/82

TO: Mr. W. Nelson (17)
Registration Division (TS-767)

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA#GEE-Q. Request for waiver of Biorational Biochemical Tier 1 Testing for Neem Extract; components of Neem Nuts are supposed to repel insects.

Registrant: Robert O. Larson
Vikwood LTD
Sheboygan, Wisconsin 53081

Action Requested:

Mr. Larson's extract of Neem Nuts (imported from India; the prepared extract contains approximately 50% ethanol. Mr. Larson is requesting that he be allowed to remove all of the alcohol and resuspend the extract in water, so that the effects of alcohol will not mask Tier 1 toxicity assays of the Neem Extract.

Recommendations:

Mr. Larson should remove the ethyl alcohol from a quantity of Neem Extract sufficient to perform the necessary Tier I Biorational Biochemical tests, and resuspend the extract in propylene glycol, prior to performing the tests. If the Neem Extract (minus alcohol) is shown to be without toxic effects for the purposes intended, the product could be marketed containing ethyl alcohol; provided proper hazard precautionary statements and signal word to accommodate the inclusion of 50% ethanol are stated on the product label (see background explanation below).

Mr. Larson's request for data waiver suggested that EPA contact Dr. Waldemer Klassen concerning Neem Extract chemistry. Dr. Klassen referred Woodrow to Dr. Martin Jacobson, U.S.D.A. at 344-2025. The U.S.D.A. has been doing some preliminary chemistry studies with Neem Extract, as they are interested in its potential as an insect repellent. At Woodrow's request, Dr. Jacobsen (June 11, 1982) agreed to examine the possibility of:

- 1) Extracting Neem Nut preparations with the ethanol;

- 2) Remove the ethanol by vacuum evaporation; and,
- 3) Attempt to resuspend the Neem preparation in relatively harmless propylene glycol, for toxicity testing.

Mr. Larson should be informed that resuspension of Neem extract in propylene glycol was successful, and that he would be allowed to perform toxicity tests with the Neem Extract containing propylene glycol, instead of ethyl alcohol.

William S. Woodrow, Ph.D
Toxicology Branch
Hazard Evaluation Division (TS-769)

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