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

7 AUG 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Update on Margosan-O

TO: Willie Nelson, PM-17

THRU: Michael W. Slimak
Chief
EEB/HED

THRU: Raymond W. Matheny
Head, Section 1
EEB/HED

I received a telephone call from Mr. Robert Larson, Vikwood Ltd, on Friday, August 2, 1985. He was responding to the EEB data requirements as outlined in a memorandum to you dated July 25, 1985. He told me the maximum expected application rate, data requirement #1, will be 8 x 10^{-4} lb./A and the weight of active ingredient per unit volume, data requirement #2, is 20 mg/L.

I then tried to explain to him why we needed the nontarget plant studies. I told him that we needed this information because extracts of Neem tree seeds had exhibited some phytotoxicity and growth inhibition during efficacy studies. These effects had not been fully explained and because of our concern for nontarget and endangered plants, this potential problem area needed further testing. I told him that I would consult with our endangered plant expert on what the definite requirements would be and get back to him.

On Monday, August 5, 1985, I made a telephone call at the request of Mr. Timothy Gardner to Curt Hutchinson, Wildlife International. It seems that Mr. Larson had requested that

cc. Tim Gardner

he find out exactly what kind of testing was still required for registration and Mr. Hutchinson had some questions that needed answering.

I said that as of right now, the testing that was being required by EEB was nontarget plant testing, specifically Seed Germination/Seedling Emergence and Vegetative Vigor. I also said that if the registrant wanted to use Margosan-O on aquatic crops, then Growth and Reproduction of Aquatic Plants would also be required. These requirements stemmed from the phytotoxicity exhibited by extracts of the Neem seeds on some plants.

He asked about the need to repeat the aquatic testing and I told him that when the studies were reviewed initially, the classification was "core" and that when the test concentrations were adjusted to reflect the amount of active ingredient (azadriachtin) in the extract, the toxicity classification of "very highly toxic" was assigned. I also related the telephone call I had with Mr. Larson (8-3-85) where Mr. Larson said that he was considering retesting the extract after some of the oil was removed because he felt that the aquatic toxicity and phytotoxicity were due to the oil that was co-extracted with the azadriachtin. I had told Mr. Larson that the new studies would be evaluated and the toxicity classification modified if warranted by the data.

Mr. Hutchinson then asked if chronic aquatic testing would be necessary and I responded by saying that I did not know at this time. Mr. Hutchinson felt that further testing would probably be necessary and he would communicate that to Mr. Larson. He also said that he would tell Mr. Larson that the basic studies were "core" and that they would not have to be repeated unless Mr. Larson wanted the toxicity classification changed.

These are the latest events that have occurred with regard to Margosan-O. I hope that they are of use to you.

Robert W. Pilsucki, Ph.D.
Microbiologist
EEB/HED