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THIS, PHF305

DP BARCODE: D160628

CASE: 048342 DATA PACKAGE RECORD DATE: 01/28/91
SUBMISSION: S386320 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 301 RESUBMISSION
CHEMICAL:
ID#: 000707-00215 RALLY 40W AGRICULTURAL FUNGICIDE IN WATER SOLUBLE POUCH
COMPANY: 000707 ROHM & HAAS COMPANY
PRODUCT MANAGER: 21 SUSAN LEWIS 703-557-1900 ROOM: CM-2 227
PM TEAM REVIEWER: JULIE FAIRFAX 703-557-7390 ROOM: CM-2 223
RECEIVED DATE: 11/15/90 DUE OUT DATE: 02/13/91

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 160628 EXPEDITE: Y DATE SENT: 01/28/91 DATE RET.: / /
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 03/14/91 CSF: N LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	01/29/91	/ /
BRAN: EEB	/ /	/ /
SECT:	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

* * * DATA PACKAGE REVIEW INSTRUCTIONS * * *

Please review amended labeling for Petition No. 9F3812, myclobutanil on pomefruits. This is a resubmission in response to the 8/14/90 meeting with EEB. Cynthia Moulton was the previous reviewer for this petition.

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
158582	FHB/PMT-21	11/26/90	01/10/91	Y	N	Y

* Cynthia Moulton - This submission of labels may contain some pts raised in your review of 12/4/90.

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

1/28/91

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Review of Myclobutanil (NOVA/RALLY) (DP BARCODE D160628) amended labeling.

FROM: Douglas J. Urban, Acting Branch Chief,
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

TO: Susan Lewis, PM-21
Fungicide-Herbicide Branch
Registration Division (H7505C)

We've reviewed the amended labeling for Petition No. 9F3812, myclobutanil on pomefruits. This is a resubmission in response to the 8-14-90 meeting with EEB, RD, and Rohm & Haas Company (see also EEB review July 25, 1990). The application rate reduction of myclobutanil to pomefruits has no mitigating effect on the aquatic concerns for endangered species; unless Rohm & Haas can provide additional acceptable environmental fate data that would indicate a reduced half-life of myclobutanil in water. The rate reduction does however, appear to reduce risk to terrestrial wildlife. The amended label would result in a reduction of terrestrial food residues from 3.8-125 ppm to 1.75-60 ppm. An environmental fate model simulating eight applications of 0.25 lb ai/A myclobutanil was calculated. Maximum and average daily residues for range grass, grass, leaves, leafy crops and forage crops exceeded the avian reproduction NOEL of 60 ppm (highest dose tested) for myclobutanil. Average daily and maximum residues for pods containing seeds, grain, and fruit were below the reproductive NOEL for the bobwhite and mallard. EEB encourages this rate reduction but it does not negate the need for reconducting the avian reproduction studies required for an accurate assessment of chronic risk to birds. At this time, the data requirements for myclobutanil pomefruit use are (2) avian reproduction studies, one each with the mallard duck and bobwhite quail indicating NOEL and LOEL, and an algae study with Selanastrum species. However, additional data may be required depending on results of the studies requested above.