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

SEPT. 17, 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Fenethanil (fenbuconazole, Indar®)-translation of residue data from aqueous flowable to wettable powder formulation. DP Barcode D181317. CB# 10358.

FROM: Richard Loranger, Ph.D., Branch Senior Scientist
Chemistry Branch Tolerance Support
Health Effects Division (H7509C) R. Loranger

THRU: Debra Edwards, Ph.D., Acting Chief
Chemistry Branch Tolerance Support
Health Effects Division (H7509C) Debra Edwards

TO: Cynthia Giles-Parker/Dolphine Wilson, PM Team 22
Fungicide Herbicide Branch
Registration Division (H7505C)

In a letter dated 8/5/92 Rohm and Haas Company has requested that we determine whether residue data generated for fenbuconazole using a 2F (aqueous flowable) formulation is sufficient for registration of a 75 WP (wettable powder) formulation.

The letter from Dr. Richard Costlow includes a comparison of the chemical compositions and certain physical properties of the two formulations. Although the letter itself does not present a rationale for translating data from the flowable to the WP, Dr. Costlow has stated in telephone conversations that Rohm and Haas believes that upon dilution in the spray tank the two products would give very similar suspensions. We have examined the chemical and physical properties of the two formulations and at this time are not prepared to draw a final conclusion concerning the validity of translating data as requested by the registrant. Although some inerts are similar in the two formulations, there are unique components that may affect the deposition, uptake, or persistence of residues.

Dr. Costlow was informed by telephone on 8/20/92 of our uncertainty with regard to translating data from the flowable to the wettable powder. He was told that we hope to decide by mid-October how we will handle this issue. Prior to that time we will be discussing a project on translation of data between formulations with NACA and will also be given a seminar by a

formulation chemist from industry. I indicated that the necessity for side-by-side residue trials for the two formulations is a real possibility.

Stone fruit and pecans are the high priority crops for the registrant. PP#'s 1F3989 and 1F3995 contain tolerance requests for these crops and are currently under review in CBTS. Since the use on pecans apparently results in low residues (0.1 ppm tolerance requested), I told Dr. Costlow that we would want the side-by-side studies to be done on stone fruit (2 ppm tolerance proposed). We would require a minimum of three such studies-one each on cherries, peaches and one other stone fruit. Applications of each formulation should be made to adjacent groups of trees using the same application rate and timing. Provided similar residues are observed from the two formulations and tolerances have been established based on complete data for the flowable formulation, the WP could be registered on stone fruits and pecans.

Rohm and Haas desires to have the registrations on the above crops by late 1993. Since the full reports are unlikely to be ready in time for obtaining registration by that date, Dr. Costlow asked whether a conditional registration could be granted for the WP at that time if at least a summary of the side-by-side trial results could be provided. I replied that this is a possibility, but could not guarantee it. Registration Division would have the final authority in granting such a registration. Although it is not applicable to residue chemistry considerations, the argument that the WP is a safer formulation with respect to loaders/applicators could be submitted for OPP's consideration of a conditional registration.

In summary, we are unable to draw a final conclusion at this time regarding the suitability of translating data from the flowable formulation to the wettable powder. We hope to make a decision on this issue by mid-October. If it is decided that side-by-side field trials are necessary, we would want a minimum of three studies-one each on cherries, peaches, and one other stone fruit. If similar residues are observed from the two formulations and tolerances have been established based on complete data for the flowable formulation, the WP could then be registered on stone fruits and pecans based on the data from the flowable formulation.

NOTE TO PRODUCT MANAGER: We request that the registrant be given a copy of this memorandum. We also want to point out that the name **"fenbuconazole"** should now be used for tracking actions involving this fungicide since that is now the ANSI and ISO accepted name according to Dr. Costlow.

cc: Circu, RF, Fenbuconazole SF, PP#1F3989 & 1F3995, Loranger
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