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

MEMORANDUM

FEB 24 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: EUP for RH-7592 2F Fungicide on Pecans
DP Barcode: 171954
ID No: 000707-EUP-REL

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) *2/21/92*

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

BACKGROUND

Rohm and Haas Company requested an EUP for RH-7592 2F (Fenbuconazole) on pecans. The objectives of this EUP request as proposed by the registrant are to:

1. To confirm product performance when applied in standard grower spray schedules and equipment
2. To define optimum use rates, application timings, and number of applications required for disease control, nut quality, and marketable yield
3. To provide opportunities to define and demonstrate product performance characteristics for Rohm and Haas Company sales and marketing personnel, agricultural chemical dealers and distributors, university and Cooperative Extension Service personnel.
-collect additional efficacy and residue data in certain states.



The company estimates that an EUP program with a duration of 22 months (March 1992 to December 1993) will be required to satisfy all proposed objectives.

CONCLUSIONS

The labeling should be adjusted to read:

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

Based on available data, the proposed EUP will not pose a significant adverse effect to avian, fish, invertebrate, or insect species.

The proposed EUP also will not pose significant adverse effects to aquatic plants.

Although acute hazard is not anticipated, the possibility exists for chronic hazard as environmental fate data indicates that RH-7592 2F is persistent in both aquatic and terrestrial environments. Therefore, the following studies are required prior to section 3 registration:

- Avian reproduction (preferably with mallard and bobwhite).
- Fish early life stage with Bluegill sunfish
- Aquatic invertebrate life-cycle.

If you have any questions, please contact Heather Mansfield (305-5064)

D171954
DPBARCODE (RECORD)
129011
SHAUGHNESSY NO

REVIEW NO.

EEB REVIEW

DATE IN: 12-12-91 OUT: _____

CASE # : 006620 REREG CASE # : _____
SUBMISSION # : S407810 LIST A, B, C, D
ID # : 000707-EUP-REL

DATE OF SUBMISSION _____ 10-07-91

DATE RECEIVED BY EFED _____ 12-09-91

SRRD/RD REQUESTED COMPLETION DATE _____ 02-22-92

EEB ESTIMATED COMPLETION DATE _____ 02-22-92

SRRD/RD ACTION CODE/TYPE OF REVIEW 710 - EUP

MRID #(S) _____

DP TYPE 001 - Submission Related Data Package

PRODUCT MANAGER, NO. C. Giles-Parker (22)

PRODUCT NAME(S) RH-7592

TYPE PRODUCT F R I N H D Fungicide

COMPANY NAME Rohm and Haas Company

SUBMISSION PURPOSE Review request for EUP on pecans

INCLUDE USE(S) _____

COMMON CHEMICAL NAME Fenbuconazole

EEB REVIEW
RH-7592 2F (Fenbuconazole)

100.0 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

Request for experimental use permit (EUP) for RH-7592 2F fungicide on pecans.

100.2 Formulation Information

Active ingredient

α -[2-(4-chlorophenyl)ethyl]- α -
phenyl-1H-1,2,4-triazole-1-
propanitrile.....22.8%*

Inert ingredients.....77.2%

*Equivalent to 2 lbs active ingredient per gallon.

100.3 Application Methods, Directions, Rates

See attached label.

100.4 Target Organisms

Downy Spot (*Mycosphaerella* sp.)

Leaf Scorch

Powdery Mildew (*Microsphaera* sp.)

Scab (*Cladosporium* sp.)

100.5 Precautionary Labeling

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Drift or runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters and rinsates.

101.0 Hazard Assessment

101.1 Discussion

Fenbuconazole, also referred to in this document as RH-7592 2F, has in the past been called several other names: Fenathanil, RH-7592 2F, and RH-57,592.

Rohm and Haas Company has submitted an application to register RH-7592 2F for experimental use on pecans. The company estimates that an EUP program with a duration of 22 months (March 1992 to December 1993) will be required to satisfy all proposed objectives.

The proposed objectives as stated by the registrant are:

1. To confirm product performance when applied in standard grower spray schedules and equipment.
2. To define optimum use rates, application timings, and number of applications required for disease control, nut quality, and marketable yield.
3. To provide opportunities to define and demonstrate product performance characteristics for Rohm and Haas Company sales and marketing personnel, agricultural chemical dealers and distributors, university and Cooperative Extension Service personnel.

The label restrictions entail ground application only, presumably with a mist-blower.

The proposed EUP of RH-7592 2F for pecans will involve the following:

REGION	STATE	# TRIALS	# ACRES	TOTAL LBS AI
EASTERN	Alabama	6	30	30
	Georgia	15	75	75
	Louisiana	6	30	30
	Mississippi	4	20	20
	Oklahoma	4	20	20
	Texas	5	25	25
TOTAL		40	200	200

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101.2 Likelihood of Adverse Effects to Nontarget Organisms

Environmental Fate Data

The following environmental fate and toxicity data was excerpted from a 1989 EEB review by Harry Winnik:

The following data was obtained from the Environmental Fate and Groundwater Branch review of EUP to test RH-7592 2F on stone fruit, submitted by Clinton Fletcher, Chemist, Review Section 1, EFGWD/EFED:

- . RH-7592 2F will be stable to hydrolysis at pH levels found in the environment.

- . RH-7592 2F will degrade in soil under aerobic conditions with a half-life of 285 and 367 days in Lawrenceville silty clay loam and Pasquotank sandy loam soils, respectively.

- . RH-7592 2F will degrade in soil under anaerobic conditions with a half-life of 451 and 655 days in the Lawrenceville silty clay loam and the Pasquotank sandy loam soils, respectively.

- . RH-7592 2F will be only slightly mobile to immobile in soils. Adsorption appears to be associated with percent organic matter present. RH-7592 2F will be slightly mobile in soils containing a low percent organic material ($\leq 1\%$) and relatively immobile in soils with higher levels of organic material.

- . RH-7592 2F residues have only a slight potential to leach in the soil environment.

- . RH-7592 2F will not bioaccumulate in fish and any residues that are taken up will be depurated when fish are no longer exposed to RH-7592 2F residues.

The above data indicate that RH-7592 2F is quite stable and may be persistent in the environment (under aerobic conditions up to 367 days and under anaerobic conditions up to 655 days).

Terrestrial Hazard

RH-7592 2F may be characterized as practically non-toxic on an acute basis to avian species (Bobwhite quail Colinus virginianus, $LD_{50} > 2150$ mg a.i./kg).

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RH-7592 2F may be characterized as slightly toxic on a subacute basis to avian species (Mallard duck Anas platyrhynchos, LC₅₀ of 2013 ppm, and Bobwhite quail Colinus virginianus, LC₅₀ of 4050 ppm).

RH-7592 2F may be characterized as relatively non-toxic to nontarget insects (Honey bee Apis mellifera, LD₅₀>292.18 ug a.i./bee).

At a maximum application rate of 8 oz/A RH-7592 2F (equivalent to 0.125 lbs a.i./A) the maximum residue expected on food items are as follows:

<u>Short</u> <u>Range</u> <u>Grass</u>	<u>Long</u> <u>Range</u> <u>Grass</u>	<u>Leaves/</u> <u>Leafy</u> <u>Crops</u>	<u>Forage</u>	<u>Pods/</u> <u>Insects</u>	<u>Fruit</u>
30 ppm	13.8 ^{ARM} 3.4 ppm	16 ppm	7.2 ppm	1.5 ppm	1 ppm

These levels are significantly below 1/5 of the LC₅₀ values for Bobwhite quail and Mallard Ducks. On the basis of this data, the proposed EUP does not pose a significant threat to birds or insects.

At the time of this review there was no mammalian toxicity data available. Therefore, a hazard assessment to mammals is not possible.

Aquatic Hazard

RH-7592 2F, with a 96-hour LC₅₀ of 1.5 mg a.i./L for Rainbow trout Salmo gairdneri, is considered moderately toxic to coldwater fish. Data for the Bluegill sunfish (Lepomis macrochirus), 96-hour LC₅₀ of 0.68 mg a.i./L, indicate that RH-7592 2F is highly toxic to warmwater fish.

The 48-hour EC₅₀ for Daphnia magna of 2.3 mg a.i./L indicates that RH-7592 2F is moderately toxic to freshwater invertebrates.

Based on the EEB scenario of a 10-acre drainage basin draining into a one acre farm pond, the maximum estimated environmental concentration (EEC) for the maximum application rate (mist blower) of 0.125 lbs a.i./A would be approximately 1.3 ppb. If the calculations are done for unincorporated ground application, an EEC of approximately 1.5 ppb is obtained. These concentration are far less than 1/10 the LC₅₀ values for coldwater fish, warmwater fish and

freshwater invertebrates. As such, RH-7592 2F does not pose a significant hazard to aquatic organisms as a result of single applications. However, according to the label instructions the potential exists for multiple applications of RH-7592 2F. Subsequently, the EPA Pesticide Residue Fate Simulation computer program was used to estimate the maximum and average residues expected from drift and runoff from a 10 acre treated area into a 1 acre pond, 6 ft. deep as a result of multiple applications of RH-7592 2F.

The EPA Pesticide Residue Fate Simulation computer program was run with the following parameters:

	SET 1	SET 3	SET 5	SET 6
EEC/APPLICATION ¹	1.3 ppb	1.3 ppb	.93 ppb	.93 ppb
HALF LIFE ²	655 days	285 days	655 days	285 days
# OF APPLICATIONS ³	8	8	11	11
APPLICATION INTERVAL ⁴	14 days	14 days	14 days	20 days
LENGTH OF SIMULATION	100 days	100 days	200 days	200 days
RESIDUE	9.8 ppb	9.3 ppb	9.5 ppb	9.2 ppb

¹The EEC sheet for a single application is attached (attachment A).

² 655 days is the anaerobic half-life of RH-7592 2F in sandy loam soil, which best approximates the half-life of RH-7592 2F that would be found in water affected from drift and runoff from use on stone fruit crops. 285 days is the aerobic half-life of RH-7592 2F in silty clay loam. This value was employed to find the range of possible residues (attachment B).

³The maximum number of applications possible when there is a maximum of 1 pound per acre active ingredient applied per season.

⁴According to the label, the application interval for repeat applications ranges from 10 to 14 days through pollination and 14 to 21 days after.

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RH-7592 2F is extremely persistent in the aquatic environment. With repeat applications at the various intervals recommended by the label, there are several triggers for the fish early life stage and invertebrate life cycle studies:

- 1/100 of the LC_{50} for Bluegill sunfish is surpassed whether the half-life is considered to be 655 days (sandy loam soil anaerobic half-life) or 285 days (silty clay loam soil aerobic half-life) and with all application rates (.09 to .125 lb a.i./acre).
- the LC_{50} for the acute toxicity to warmwater fish is < 1 ppm
- RH-7592 2F is extremely persistent in water. The half-life from photolysis in water is 1283 days and the compound is stable to hydrolysis at pH range of 5-9.

The avian reproduction study, preferably with bobwhite and mallard, is also triggered by RH-7592 2F's persistence in the environment.

Plant Hazard

Due to the low water solubility of RH-7592 2F (3.8 ppm) the hazard to aquatic plants should be minimal and aquatic plant growth testing on the freshwater green alga Selenastrum capricornutum will not be required at this time.

101.1 Endangered Species Consideration

The proposed EUP extension does not pose a hazard to aquatic or terrestrial endangered species.

101.4 Adequacy of Toxicity Data

Prior to section 3 registration the following data will be required:

- . Avian reproduction (preferably Mallard and Bobwhite)
- . Fish early life stage (with Bluegill sunfish)
- . Invertebrate life cycle

Following review of required EEB data, submission of additional toxicity data may be necessary.

101.5 Adequacy of Labeling

The labeling for the current proposed use of RH-7592 2F should read:

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

102.0 Classification

Not classified.

103.0 Conclusions

Based on available data, the proposed EUP will not pose a significant adverse effect to avian, fish, invertebrate, or insect species.

RH-7592 2F has a low water solubility. Consequently, the proposed EUP will not pose significant adverse effects to aquatic plants.

Although acute hazard is not anticipated, the possibility exists for chronic hazard as environmental fate data indicates that RH-7592 2F is persistent in both aquatic and terrestrial environments. Therefore, the following studies are required prior to section 3 registration:

- Avian reproduction (preferably with mallard and bobwhite).
- Fish early life stage with Bluegill sunfish
- Aquatic invertebrate life-cycle.

Heather Mansfield, Zoologist, Section 2
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) 2/19/92

Allen Vaughan, Acting Head, Section 2
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) 2-19-92

Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) 2/21/92

EEC CALCULATION SHEETI. For un-incorporated ground application

A. Runoff

$$0.125 \text{ lb(s)} \times \frac{0.02}{(\% \text{ runoff})} \times \frac{10 \text{ (A)}}{(\text{from } 10 \text{ A. drainage basin})} = \frac{0.025 \text{ lb(s)}}{(\text{tot. runoff})}$$

EEC of 1 lb a.i. direct application to 1 A. pond 6-foot deep = 61 ppb

$$\text{Therefore, EEC} = 61 \text{ ppb} \times 0.025 \text{ (lb)} = \underline{1.525} \text{ ppb}$$

II. For incorporated ground application

A. Runoff

$$\frac{\text{lb(s)}}{(\text{depth of incorporation})} \times \frac{\text{(cm)}}{(\% \text{ runoff})} \times \frac{0.0}{(\text{10 A. d.basin})} \times \frac{10 \text{ (A)}}{(\text{tot. runoff})} = \text{lb(s)}$$

$$\text{Therefore, EEC} = 61 \text{ ppb} \times \text{ (lbs)} = \text{ppb}$$

III. For aerial application (or mist blower)

A. Runoff

$$\begin{matrix} (.09) \\ 0.125 \end{matrix} \text{ lb(s)} \times \frac{0.6}{(\text{appl. efficiency})} \times \frac{0.02}{(\% \text{ runoff})} \times \frac{10 \text{ (A)}}{(\text{10 A. d.basin})} = \frac{(.0108)}{.015} \text{ lb(s)} \quad (\text{tot. runoff})$$

B. Drift

$$\begin{matrix} (.09) \\ .125 \end{matrix} \text{ lb(s)} \times \frac{0.05}{(5 \% \text{ drift})} = \frac{(.0045)}{.0063} \text{ lb(s)} \quad (\text{tot. drift})$$

$$\text{Tot. loading} = \frac{(.0108)}{(.015)} \text{ lb(s)} + \frac{(.0045)}{(.0063)} \text{ lb(s)} = \frac{(.0153)}{.0213} \text{ lb(s)}$$

$$\text{Therefore, EEC} = 61 \text{ ppb} \times \frac{(.0153)}{.0213} \text{ (lbs)} = \underline{1.3} \text{ ppb}$$

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

Chemical name ----- FENBUCONAZOLE
Initial concentration (ppb) ----- 1.3
Half-life ----- 655
A number of application ----- 8
Application interval ----- 14
Length of simulation (day) ----- 100

DAY RESIDUE (PPM)

0	1.3	1 st application
1	1.298625	
2	1.297252	
3	1.295879	
4	1.294509	
5	1.29314	
6	1.291772	
7	1.290406	
8	1.289041	
9	1.287677	
10	1.286315	2 nd
11	1.284955	
12	1.283596	
13	1.282238	
14	2.580882	
15	2.578152	
16	2.575425	
17	2.572702	
18	2.56998	
19	2.567262	
20	2.564547	3 rd
21	2.561834	
22	2.559125	
23	2.556418	
24	2.553714	
25	2.551013	
26	2.548315	
27	2.54562	
28	3.842927	
29	3.838863	
30	3.834802	4 th
31	3.830746	
32	3.826694	
33	3.822647	
34	3.818604	
35	3.814565	
36	3.81053	
37	3.8065	
38	3.802474	
39	3.798452	
40	3.794435	5 th
41	3.790422	
42	5.086413	
43	5.081033	
44	5.075659	
45	5.07029	
46	5.064927	
47	5.059571	
48	5.054219	
49	5.048873	
50	5.043533	6 th application
51	5.038199	
52	5.03287	
53	5.027546	
54	5.022229	
55	5.016917	
56	6.311611	
57	6.304935	
58	6.298267	
59	6.291605	
60	6.284951	Surpasses 1/100 bluegill
61	6.278303	
62	6.271663	
63	6.265029	
64	6.258403	
65	6.251783	
66	6.245171	
67	6.238566	
68	6.231967	
69	6.225376	
70	7.518791	
71	7.510839	
72	7.502895	

73	7.494959
74	7.487032
75	7.479113
76	7.471202
77	7.4633
78	7.455406
79	7.447521
80	7.439645
81	7.431775
82	7.423915
83	7.416063
84	8.708219
85	8.699008
86	8.689807
87	8.680616
88	8.671436
89	8.662264
90	8.653101
91	8.643949
92	8.634806
93	8.625673
94	8.616551
95	8.607437
96	8.598333
97	8.589239
98	9.880154
99	9.869704
100	9.859264

Maximum residue -----
Average residue -----

9.880154
5.159456

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

Chemical name -----	RH-7592 2F
Initial concentration (ppm) -----	.93
Half-life -----	655
A number of application -----	11
Application interval -----	14
Length of simulation (day) -----	200

DAY ---	RESIDUE (PPM) -----
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0	.93
1	.9290164
2	.9280338
3	.9270522
4	.9260716
5	.9250922
6	.9241138
7	.9231363
8	.9221599
9	.9211846
10	.9202102
11	.9192369
12	.9182647
13	.9172935
14	1.846323
15	1.844371
16	1.84242
17	1.840471
18	1.838524
19	1.83658
20	1.834637
21	1.832697
22	1.830758
23	1.828822
24	1.826888
25	1.824956
26	1.823025
27	1.821097
28	2.749171
29	2.746263
30	2.743359
31	2.740457
32	2.737558
33	2.734663
34	2.731771
35	2.728881
36	2.725995
37	2.723112
38	2.720232
39	2.717354
40	2.71448
41	2.711609
42	3.638741
43	3.634893

44	3.631048
45	3.627208
46	3.623371
47	3.619539
48	3.615711
49	3.611886
50	3.608066
51	3.60425
52	3.600438
53	3.59663
54	3.592826
55	3.589026
56	4.515229
57	4.510454
58	4.505683
59	4.500918
60	4.496157
61	4.491402
62	4.486652
63	4.481906
64	4.477165
65	4.47243
66	4.467699
67	4.462974
68	4.458254
69	4.453538
70	5.378828
71	5.373139
72	5.367456
73	5.361779
74	5.356107
75	5.350443
76	5.344784
77	5.339131
78	5.333483
79	5.327842
80	5.322207
81	5.316578
82	5.310955
83	5.305338
84	6.229726
85	6.223138
86	6.216555
87	6.209979
88	6.203412
89	6.196851
90	6.190296
91	6.183749
92	6.177208
93	6.170675
94	6.164149
95	6.157628
96	6.151116
97	6.14461
98	7.068111
99	7.060635
100	7.053167
101	7.045707
102	7.038255
103	7.030811

104	7.023374
105	7.015946
106	7.008525
107	7.001113
108	6.993708
109	6.98631
110	6.978921
111	6.97154
112	7.894166
113	7.885817
114	7.877476
115	7.869144
116	7.860821
117	7.852507
118	7.844201
119	7.835905
120	7.827617
121	7.819338
122	7.811068
123	7.802806
124	7.794553
125	7.786309
126	8.708072
127	8.698863
128	8.689662
129	8.680471
130	8.671291
131	8.662119
132	8.652956
133	8.643804
134	8.634662
135	8.62553
136	8.616408
137	8.607293
138	8.598189
139	8.589095
140	9.510012
141	9.499952
142	9.489906
143	9.479867
144	9.469841
145	9.459826
146	9.449819
147	9.439824
148	9.429839
149	9.419866
150	9.409902
151	9.39995
152	9.390007
153	9.380076
154	9.370156
155	9.360245
156	9.350344
157	9.340455
158	9.330576
159	9.320708
160	9.310848
161	9.300999
162	9.291164
163	9.281337

164	9.271519
165	9.261713
166	9.251916
167	9.242131
168	9.232355
169	9.222591
170	9.212838
171	9.203092
172	9.193359
173	9.183636
174	9.173922
175	9.164218
176	9.154526
177	9.144843
178	9.135171
179	9.125509
180	9.115856
181	9.106216
182	9.096583
183	9.086962
184	9.077352
185	9.06775
186	9.05816
187	9.048579
188	9.039008
189	9.029448
190	9.019898
191	9.010358
192	9.000827
193	8.991308
194	8.981798
195	8.972298
196	8.962808
197	8.953328
198	8.943858
199	8.934399
200	8.924949

Maximum residue	-----
Average residue	-----

9.510012
6.183112

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

Chemical name	-----
Initial concentration (ppm)	-----
Half-life	-----
A number of application	-----
Application interval	-----
Length of simulation (day)	-----

RH-7592 2F
.93
655
11
20
200

DAY	RESIDUE (PPM)
---	-----

0	.93
1	.9290164
2	.9280338
3	.9270522
4	.9260716

5	.9250922
6	.9241138
7	.9231363
8	.9221599
9	.9211846
10	.9202102
11	.9192369
12	.9182647
13	.9172935
14	.9163233
15	.9153541
16	.9143859
17	.9134188
18	.9124527
19	.9114876
20	1.840524
21	1.838577
22	1.836632
23	1.83469
24	1.832749
25	1.830811
26	1.828874
27	1.82694
28	1.825008
29	1.823077
30	1.821149
31	1.819223
32	1.817299
33	1.815377
34	1.813457
35	1.811539
36	1.809622
37	1.807709
38	1.805796
39	1.803887
40	2.731979
41	2.729089
42	2.726203
43	2.723319
44	2.720439
45	2.717561
46	2.714687
47	2.711816
48	2.708948
49	2.706082
50	2.70322
51	2.700361
52	2.697505
53	2.694652
54	2.691802
55	2.688955
56	2.686111
57	2.68327
58	2.680431
59	2.677596
60	3.604765
61	3.600952
62	3.597143
63	3.593339
64	3.589538

65	3.585741
66	3.581949
67	3.57816
68	3.574376
69	3.570595
70	3.566818
71	3.563046
72	3.559277
73	3.555513
74	3.551753
75	3.547996
76	3.544243
77	3.540494
78	3.536749
79	3.533009
80	4.459273
81	4.454556
82	4.449844
83	4.445138
84	4.440437
85	4.43574
86	4.431048
87	4.426361
88	4.42168
89	4.417003
90	4.412331
91	4.407665
92	4.403003
93	4.398346
94	4.393694
95	4.389046
96	4.384404
97	4.379767
98	4.375135
99	4.370507
100	5.295884
101	5.290283
102	5.284688
103	5.279098
104	5.273515
105	5.267937
106	5.262365
107	5.256799
108	5.251239
109	5.245685
110	5.240137
111	5.234595
112	5.229058
113	5.223527
114	5.218002
115	5.212484
116	5.20697
117	5.201463
118	5.195961
119	5.190466
120	6.114976
121	6.108508
122	6.102047
123	6.095593
124	6.089146

125	6.082706
126	6.076272
127	6.069846
128	6.063425
129	6.057012
130	6.050606
131	6.044206
132	6.037814
133	6.031428
134	6.025048
135	6.018676
136	6.01231
137	6.00595
138	5.999598
139	5.993252
140	6.916914
141	6.909598
142	6.90229
143	6.894989
144	6.887697
145	6.880412
146	6.873134
147	6.865865
148	6.858603
149	6.851348
150	6.844102
151	6.836863
152	6.829632
153	6.822408
154	6.815192
155	6.807984
156	6.800783
157	6.793591
158	6.786405
159	6.779227
160	7.702057
161	7.693911
162	7.685773
163	7.677644
164	7.669523
165	7.661411
166	7.653308
167	7.645214
168	7.637127
169	7.62905
170	7.620981
171	7.612919
172	7.604868
173	7.596824
174	7.588789
175	7.580763
176	7.572745
177	7.564735
178	7.556734
179	7.548742
180	8.470758
181	8.461798
182	8.452848
183	8.443908
184	8.434977

185	8.426056
186	8.417143
187	8.408241
188	8.399346
189	8.390464
190	8.381589
191	8.372723
192	8.363868
193	8.355021
194	8.346185
195	8.337357
196	8.328539
197	8.31973
198	8.310931
199	8.30214
200	9.223359

Maximum residue	-----	9.223359
Average residue	-----	4.780933

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

Chemical name -----	RH-7592 2F
Initial concentration (ppm) -----	1.3
Half-life -----	285
A number of application -----	8
Application interval -----	14
Length of simulation (day) -----	100

DAY	RESIDUE (PPM)
---	-----

0	1.3
1	1.296842
2	1.293692
3	1.290549
4	1.287414
5	1.284287
6	1.281167
7	1.278055
8	1.274951
9	1.271854
10	1.268764
11	1.265682
12	1.262608
13	1.259541
14	2.556481
15	2.550271
16	2.544076
17	2.537896
18	2.531731
19	2.525581
20	2.519446
21	2.513326
22	2.507221
23	2.50113
24	2.495055
25	2.488994
26	2.482948
27	2.476916
28	3.7709
29	3.76174
30	3.752602
31	3.743486
32	3.734393
33	3.725321
34	3.716272
35	3.707245
36	3.698239
37	3.689256
38	3.680294
39	3.671354
40	3.662436
41	3.653539
42	4.944664
43	4.932653

44	4.920671	
45	4.908718	
46	4.896794	
47	4.884899	
48	4.873033	
49	4.861196	
50	4.849387	
51	4.837607	
52	4.825856	
53	4.814133	
54	4.802439	
55	4.790774	
56	6.079136	
57	6.064369	
58	6.049638	
59	6.034942	
60	6.020282	
61	6.005658	
62	5.99107	
63	5.976517	
64	5.961999	
65	5.947516	
66	5.933069	
67	5.918657	
68	5.904279	
69	5.889938	
70	7.17563	
71	7.158199	
72	7.14081	
73	7.123465	
74	7.10616	
75	7.088899	
76	7.071679	
77	7.054501	
78	7.037364	
79	7.02027	
80	7.003217	
81	6.986204	
82	6.969234	
83	6.952305	
84	8.235416	
85	8.215412	
86	8.195456	
87	8.175548	
88	8.155688	
89	8.135876	
90	8.116114	
91	8.096398	
92	8.076731	
93	8.057112	
94	8.03754	
95	8.018015	
96	7.998539	
97	7.979109	
98	9.259726	
99	9.237233	
100	9.214794	
Maximum residue	-----	9.259726
Average residue	-----	4.92204

RIN 3477-95

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Page is not included in this copy.

Pages 24 through 27 are not included.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients.
- ☐ Identity of product impurities.
- ☐ Description of the product manufacturing process.
- ☐ Description of quality control procedures.
- ☐ Identity of the source of product ingredients.
- ☐ Sales or other commercial/financial information.
- ☒ A draft product label.
- ☐ The product confidential statement of formula.
- ☐ Information about a pending registration action.
- ☐ FIFRA registration data.
- ☐ The document is a duplicate of page(s) .
- ☐ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.