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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JUL 1 1987

MEMORANDUM

SUBJECT: 53219-EUP-E. Bacillus thuringiensis var. san diego. Mycogen Corp. M-ONE Insecticide. Record No. 196670. RCB No. 2342.

FROM: William J. Hazel, Ph.D., Chemist
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TO: Willie Nelson, PMT-17
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THRU: Charles L. Trichilo, Ph.D., Chief
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Mycogen Corp. has submitted additional data in support of their Experimental Use Permit (EUP) request 53219-EUP-E to field test their strain of Bacillus thuringiensis var. san diego. A new chemical screen of Sections D, E, F, and G was performed by W. J. Hazel (3/25/87). The earlier submission failed the screen because Section A (product chemistry) and Section B (proposed label) were not available for review. RCB concluded that Mycogen's B. thuringiensis var. san diego strain falls under the exemption at 40 CFR 180.1011 if their strain is an authentic member of the species B. thuringiensis and if their product (M-ONE® Insecticide) does not contain detectable concentrations of beta-exotoxin (thuringiensin). As an exempt active ingredient, residue data would not be required for B. thuringiensis var. san diego. RCB also concluded that if the proposed experimental program would not involve a nonindigenous or genetically-engineered strain, then the testing program has been adequately described.

## Conclusions and Recommendations

The submitted data are adequate to support the requested EUP with the exception that copies of the 10% L and 20% WP labels (in the form to be provided to the cooperators) must be submitted. Note that additional product chemistry data will be required prior to Section 3 registration (see Detailed Considerations). Also note that residue chemistry data will not be required for Mycogen's B. thuringiensis var. san diego because it is indigenous, genetically unmodified, and because it does not produce detectable levels of beta-exotoxin (thuringiensin).

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