US EPA ARCHIVE DOCUMENT

Donald [illegible] 5-18-92

DATE: 5/14/92 PRODUCT CHEMIST/REVIEWER: MICHAEL J. CLIFFORD MJC

PAGE: 1 OF 3 CONCURRED BY: _____

COMPANY: E. I. du PONT de NEMOURS EPA REG. NO: 352-354

PRODUCT NAME: DUPONT BENLATE FUNGICIDE

TO PM NO: 21 ACTION CODE: 345

BACKGROUND: Revised CSF for basic formulation and application for two alternate formulations in water-soluble bags.

ACTIVE INGREDIENT LABEL CLAIM/ LATEST LABEL CLAIM (DATED 3/27/91)

BENOMYL: METHYL 1-(BUTYLCARBAMOYL)-2-BENZIMIDAZOLECARBAMATE (50%)

REFERENCES USED: [redacted]

FOOD USE (X) INERTS CLEARED C(X), D(X) NON FOOD USE ( )
CFR 21 PARTS 170-199 ( ) TOXIC INERTS LIST 1( ), 2( )

COMMENTS:

a) In reference to CSF dated 1/20/92 for the basic formulation and the two CSFs dated 3/9/92 for the two alternate formulations: (1) The impurities should not be separated from technical BENOMYL. The components should be listed on the CSF as actually introduced into the formulation. The total weight should be included under Column #13. a and the corresponding percentage by weight under Column # 13. b. Based on a label claim [redacted] the nominal concentration of BENOMYL in your product would be: [redacted] or 50% which agrees with the label claim (2) The current lower certified limit of 50% for BENOMYL is the same as the nominal concentration and the label claim. As required in PR NOTICE 91-2, the nominal concentration should fall between the upper and lower certified limits. Moreover,

(continued)

MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

the lower certified limit may not fall below the efficacy level. Note that compliance with PR NOTICE 91-2 for registered products may be implemented at the time of reregistration of the source product or prior to July 1, 1997.

(3) The upper and lower certified limits for BENOMYL should be based on the pure active ingredient rather than the technical or concentrate and thus should bracket the nominal concentration.

(4) The density of the product should be listed in Block #7.

(5) The total weight should be listed in Block #17.

b) In reference to the two CSFs dated 3/9/92 for the two alternate formulations:

[redacted] is not exempted from the requirement of a tolerance under 40 CFR 180.1001. Therefore, [redacted] may not be used in pesticide formulations applied to growing crops or to raw agricultural commodities after harvest.

(2) Have your suppliers provide EPA with the chemical compositions of: [redacted] The supplier should provide the following for each component in the film: the chemical name, CAS Registry Number, and the percentage or range in percentage in the film. The suppliers may contact EPA directly referencing the EPA registration in their responses.

(continued)

Inert Ingredient Information is not Included

c) At the next label revision:

(1) In reference to the STORAGE AND DISPOSAL instructions, the statement: "Do not contaminate water, food or feed by storage or disposal" should be removed from under the PRODUCT DISPOSAL subheading and placed directly under the main STORAGE AND DISPOSAL heading.

(2) Since your alternate formulations will be supplied in [redacted] water-soluble bags, the label should be revised to indicate that the product will be packaged in one pound [redacted] water-soluble bags. The directions should indicate that [redacted] bags should be completely dissolved in water prior to use. Moreover, the use dosage should be given in terms of the number [redacted] water-soluble bags per acre which is equivalent to pounds of bulk product per acre. The STORAGE AND DISPOSAL statement will need to be expanded for the disposal of the outer wrapping for [redacted] bags.

d) Since the alternate formulations will be packaged [redacted] water-soluble bags, one year storage stability data at ambient warehouse conditions on the product [redacted] water-soluble bags should be submitted to EPA upon completion of the tests.