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To: SUSAN LEWIS
Product Manager 21
Registration Division (H7505C)

From: Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 284494
Chemical Name : BENOMYL
Type Product : FUNGICIDE
Product Name :
Company Name : DUPONT
Purpose : REVIEW PLANT STUDY PROTOCOLS

Action Code : 405 Date Due : 5-15-93
Reviewer : RICK PETRIE Date In EEB: 3-11-93

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur
P=Partial (Study partially fulfilled Guideline but additional information is needed)
S=Supplemental (Study provided useful information but Guideline was not satisfied)
N=Unacceptable (Study was rejected)/Nonconcur



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

MAY 17 1993

DP D188992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Review and Comments RE: Tier I Nontarget Plant
Phytotoxicity Test Protocol For Benlate 50DF
Fungicide

FROM: Anthony F. Maciorowski, Chief 
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

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

The Ecological Effects Branch (EEB) has reviewed the protocol submitted by DuPont, MRID number 426870-03, "Influence Of Benlate 50 DF Fungicide On Seed Germination, Seedling Emergence, and Vegetative Vigor Of Several Terrestrial Plants". This protocol for 122-1 Tier I Nontarget Terrestrial Plant Phytotoxicity tests is submitted in response to an agency data call in notice issued 6/16/92. A 3/02/93 letter from DuPont to Ms. Kate Bouve states that the Tier I protocol for Aquatic Plant Growth (guideline number 122-2) is still under preparation and will be submitted to the EPA in April of 1993. Both the terrestrial and aquatic plant studies are scheduled for completion by June 1993. The EEB has not received the aquatic plant growth protocol as of the date of this memo.

The Tier I terrestrial nontarget plant phytotoxicity protocol for testing Benlate 50 DF fungicide is acceptable. A few specific questions/comments:

- 1.) Container size and type not given. We prefer plastic containers over peat or clay. The plants in seedling emergence and vegetative vigor tests will be thinned to 6/container (onion, wheat, sorghum), 3/container (sugarbeet, pea, rape), and 1/container (corn, cucumber, tomato, soybean). Thinning densities will depend on container size and plant competition. Please provide logic for thinning densities of the various test species.

- 2.) On page 9, under G. REPORTING OF INFORMATION, 3.d., the protocol states that all "non-test" agricultural chemicals will be reported (fertilizers, insecticides, fungicides, etc.). Please note that under Subdivision J Guidelines, no pesticides other than the test chemical are to be used.
- 3.) If solvents are used, a solvent control plus a negative control are required under Subdivision J.

If you have any questions regarding this protocol review, please contact Richard Petrie at (703) 305-7358, room 1030L, CM-2.