

US EPA ARCHIVE DOCUMENT



155976  
RECORD NO.

100601  
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 2-11-86 OUT 08 SEP 1988

FILE OR REG. NO 3125-236

PETITION OR EXP. NO. \_\_\_\_\_

DATE OF SUBMISSION 7-1-85

DATE RECEIVED BY HED 2-6-86

RD REQUESTED COMPLETION DATE 4-22-86

EEB ESTIMATED COMPLETION DATE 4-15-86

RD ACTION CODE/TYPE OF REVIEW 335

TYPE PRODUCT(S) : I, D, H, F, N, R, S Nematicide

DATA ACCESSION NO(S). \_\_\_\_\_

PRODUCT MANAGER NO. L. Rossi (21)

PRODUCT NAME(S) Nemacur 15% Granular

COMPANY NAME Mobay Chemical Corp.

SUBMISSION PURPOSE Proposed registration for use on garlic

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
<u>100601</u>	<u>Fenamiphos</u>	<u>15%</u>
_____	_____	_____
_____	_____	_____

159089  
RECORD NO.

100601  
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 2-11-86 OUT 08 SEP 1988

FILE OR REG. NO 3125-236

PETITION OR EXP. NO. \_\_\_\_\_

DATE OF SUBMISSION 8-26-85

DATE RECEIVED BY HED 2-6-86

RD REQUESTED COMPLETION DATE 4-22-86

EEB ESTIMATED COMPLETION DATE 4-15-86

RD ACTION CODE/TYPE OF REVIEW 315

TYPE PRODUCT(S) : I, D, H, F, N, R, S Nematicide

DATA ACCESSION NO(S). \_\_\_\_\_

PRODUCT MANAGER NO. L. Rossi (21)

PRODUCT NAME(S) Nemacur 15% Granular

COMPANY NAME Mobay Chemical Corp.

SUBMISSION PURPOSE Proposed registration for use on non-bearing  
strawberry nursery stock

SHAUGHNESSEY NO.                      CHEMICAL, & FORMULATION                      % A.I.

100601                      Fenamiphos                      15%



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

018 SEP 1988.

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

To: L. Rossi, Product Manager  
Team #21, FHB/RD

From: James W. Akerman, Chief *Henry T. Crowen*  
Ecological Effects Branch/EFED

Subject: 3125-236  
Proposed uses of Nemacur 15% Granular (fenamiphos)  
on garlic and non-bearing strawberries

In a June 16, 1988 analysis of granular pesticides, EEB concluded that fenamiphos was one of eight granular pesticides that pose the greatest risk to birds. Based on this analysis, the Hazard Evaluation Division and the Registration Division recommended to the OPP Policy Group (on July 28, 1988) that fenamiphos and the other seven chemicals be placed or continued in Special Review (two chemicals were already in Special Review). An implementation strategy is currently being developed before taking this recommendation back to Policy Group.

Based on the science findings in EEB's granular analysis concerning risk to birds from fenamiphos, EEB recommends that no new uses of granular fenamiphos be considered at this time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

019 SEP 1988

Memorandum

To: L. Rossi, Product Manager  
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From: James W. Akerman, Chief  
Ecological Effects Branch/EFED

Subject: 3125-236  
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on garlic and non-bearing strawberries

In a June 16, 1988 analysis of granular pesticides, EEB concluded that fenamiphos was one of eight granular pesticides that pose the greatest risk to birds. Based on this analysis, the Hazard Evaluation Division and the Registration Division recommended to the OPP Policy Group (on July 28, 1988) that fenamiphos and the other seven chemicals be placed or continued in Special Review (two chemicals were already in Special Review). An implementation strategy is currently being developed before taking this recommendation back to Policy Group.

Based on the science findings in EEB's granular analysis concerning risk to birds from fenamiphos, EEB recommends that no new uses of granular fenamiphos be considered at this time.

CONCURRENCES

SYMBOL	TS 769C	TS 769C					
SURNAME	<i>Field</i>	<i>Crown</i>					
DATE	9-7-88	9-7-88					



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF PESTICIDE PROGRAM (TS-747)  
WASHINGTON, D.C. 20460

APPLICATION FOR PESTICIDE:

REGISTRATION  
 AMENDMENT

A

Please read instructions on reverse before completing.

SECTION I

1. COMPANY/PRODUCT NO. 3125-236-AA	2. DATE August 26, 1985	3. PRODUCT MANAGER Henry M. Jacoby (21)	4. PROPOSED CLASSIFICATION <input type="checkbox"/> GENERAL <input type="checkbox"/> RESTRICTED
5. NAME AND ADDRESS OF APPLICANT (Include ZIP Code) MOBAY CHEMICAL CORPORATION AGRICULTURAL CHEMICALS DIVISION P. O. Box 4913 Kansas City, Missouri 64120			
<input type="checkbox"/> CHECK IF THIS IS A NEW ADDRESS			
6. PRODUCT NAME ©NEMACUR 15% Granular			

SECTION II

1. SUBJECT OF AMENDMENT

REUEMISSION IN RESPONSE TO AGENCY LETTER DATED \_\_\_\_\_

FINAL PRINTED LABEL IN RESPONSE TO AGENCY LETTER DATED \_\_\_\_\_

OTHER (explain below)

This application proposes to add label claims for use of the product on non-bearing strawberry nursery stock for the control of nematodes. This application is being submitted at the request of the Interregional Research Project No. 4 (IR-4) to meet the need for a minor crop registration.

(Continued on Attachment)

SECTION III

1. WILL THIS PRODUCT BE PACKAGED IN:		2. TYPE OF CONTAINER	
CHILD-RESISTANT PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO UNIT PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, unit pkg. wt. _____ No. per container _____ WATER-SOLUBLE PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, pkg. wt. _____ No. per container _____		<input type="checkbox"/> METAL <input type="checkbox"/> PLASTIC <input type="checkbox"/> GLASS <input type="checkbox"/> PAPER <input type="checkbox"/> OTHER (Specify)	
3. LOCATION OF NET CONTENTS <input type="checkbox"/> LABEL <input type="checkbox"/> CONTAINER		4. SIZE(S) OF RETAIL CONTAINER	
5. LOCATION OF LABEL DIRECTIONS <input type="checkbox"/> ON LABEL <input type="checkbox"/> ON MATERIAL ACCOMPANYING PRODUCT		6. MANNER IN WHICH LABEL IS AFFIXED TO PRODUCT <input type="checkbox"/> LITHOGRAPH <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/> PAPER GLUED <input type="checkbox"/> STENCILED	

SECTION IV

1. CONTACT POINT (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).		6. DATE APPLICATION RECEIVED (Stamped)	
NAME G. E. Brussell			
TITLE Manager, Registrations		TELEPHONE NO. (Include Area Code) 816-242-2383	
2. SIGNATURE <i>GE Brussell</i>		3. TITLE Manager, Registrations	
4. TYPED NAME G. E. Brussell		5. DATE SIGNED 8/26/85	

ⓈNEMACUR 15% Granular  
EPA Reg. No. 3125-236-AA

1. SUBJECT OF AMENDMENT (Continued)

Based on information provided by IR-4, there is need for an effective post-plant nematicide for use on strawberry nursery stock. In order to produce certified strawberry planting stock, the plants must be virus-free and essentially free of injurious nematodes. Although the fields are treated (usually by fumigation) before strawberry nursery stock is planted, recontamination by nematodes from adjacent untreated fields does occur during winter months. Since these re-introduced nematodes can multiply very rapidly in the fumigated soil, post-plant control measures are needed.

IR-4 reports that two post-plant band applications of NEMACUR 15% Granular 4 to 8 weeks apart at the rate of 2.0 pounds active ingredient/acre provide effective control of nematodes infesting strawberry nursery stock. On this basis, we are requesting amended registration of NEMACUR 15% Granular to add the claims for use on non-bearing strawberry nursery stock as shown in the enclosed draft label amendment dated 8/20/85. We request that the Agency waive efficacy data requirements for this application in accordance with its statutory authority under FIFRA, as amended.

This proposed use of NEMACUR 15% Granular is considered to be a non-food use. This use should not result in residues in edible fruit for the following reasons:

- (1) Strawberries being grown for transplants are stripped of all flowers. This flower removal is necessary to promote vegetative growth resulting in healthy, vigorous transplants;
- (2) The last application of NEMACUR 15% Granular to strawberry "mother" plants in the nursery is made at least 20 months before any fruit is picked from transplants by the final purchaser/grower.
- (3) When transplants are harvested from the nursery all soil and most leaves are removed during cleaning and preparation for shipment and sale.

In the last several years the Agency has permitted the use of NEMACUR on non-bearing strawberry nursery stock in the manner described above under FIFRA Section 18 exemptions in at least one state (Maryland).

YLD26

U.S. LABEL

Reason to Issue: To propose use on non-bearing strawberry nursery stock. Date of Draft: 8/20/85 (Pre-Reg) (H)

EPA Reg. No. 3125-236-AA

® NEMACUR

15% Granular

SYSTEMIC INSECTICIDE NEMATOCIDE

ACTIVE INGREDIENT:

Ethyl 3-methy-4-(methylthio)phenyl  
(1-methylethyl)phosphoramidate ..... 15%

INERT INGREDIENTS: ..... 85%  
100%

AMENDMENT TO  
Previously Registered Labeling

Add the following:

DIRECTIONS FOR USE

CROP	PEST	DOSAGE NEMACUR 15% G BAND: Ozs/1000 ft. row	REMARKS
Non-bearing Strawberry nursery stock	Nematodes	17 ozs for any row spacing (or 13.8 pounds per acre on 40 inch rows)	BAND: Apply specified dosage in ozs. per 1000 ft. of row in a 12 inch band over the row immediately after transplanting and incorporate to a depth of 1-2 inches with cultivation equipment. Apply a second application in a 12 inch band over the row 8 weeks after transplanting. Incorporate by cultivation or by sprinkler irrigation (1 in. of water) immediately following application. Do not apply more than two applications to non-bearing nursery stock. Use only on strawberry nursery stock that will not be harvested for fruit within 20 months after application.

©NEMACUR 15% Granular  
EPA Reg. No. 3125-236-AA

1. SUBJECT OF AMENDMENT (Continued)

Data supporting of this application are listed in the enclosed Attachment I "Research Data References, NEMACUR Fenamiphos Insecticide-Nematicide." Included with this application is a completed and signed Attachment B "Certification with Respect to Offer to Pay and General Offer to Pay" in compliance with PR Notice 84-4. As indicated on the attachment, we are proceeding under the "Cite-All" method of support. The most recent list of pesticide data submitters dated May 8, 1984 shows that only Mobay and Pineapple Growers Association of Hawaii (PGAH) have submitted data on fenamiphos (Chemical No. 100601). Although it is our opinion that the PGAH data are not relevant to this application, we note that we have previously submitted a letter which authorizes the Agency to review PGAH data in connection with the review of registration applications for fenamiphos submitted by Mobay.

If, during the course of the Agency's review of this application, pertinent comments or questions arise, we would like to receive a copy of the actual review notes. Having a copy of the actual notes aids us in formulating timely replies to the Agency.



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF PESTICIDE PROGRAM [TS-767]  
WASHINGTON, D.C. 20460

APPLICATION FOR PESTICIDE:  REGISTRATION  AMENDMENT **A**

Form Approved OMB No. 2000-0012

Please read instructions on reverse before completing.

SECTION I

1. COMPANY/PRODUCT NO. 3125-236	2. DATE July 1, 1985	3. PRODUCT MANAGER Henry M. Jacoby (21)	4. PROPOSED CLASSIFICATION <input type="checkbox"/> GENERAL <input type="checkbox"/> RESTRICTED
5. NAME AND ADDRESS OF APPLICANT (Include ZIP Code)			
MOBAY CHEMICAL CORPORATION AGRICULTURAL CHEMICALS DIVISION P. O. Box 4913 Kansas City, Missouri 64120			
<input type="checkbox"/> CHECK IF THIS IS A NEW ADDRESS			

6. PRODUCT NAME  
©NEMACUR 15% Granular

SECTION II

1. SUBJECT OF AMENDMENT

RESUBMISSION IN RESPONSE TO AGENCY LETTER DATED \_\_\_\_\_

FINAL PRINTED LABEL IN RESPONSE TO AGENCY LETTER DATED \_\_\_\_\_

OTHER (explain below)

This application proposes registration of NEMACUR 15% Granular for use in controlling nematodes infesting garlic in the United States.

(Continued on Attachment)

SECTION III

1. WILL THIS PRODUCT BE PACKAGED IN:		2. TYPE OF CONTAINER	
CHILD-RESISTANT PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO UNIT PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, unit pkg. wt. _____ No. per container _____ WATER-SOLUBLE PACKAGING <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, pkg. wt. _____ No. per container _____		<input type="checkbox"/> METAL <input type="checkbox"/> PLASTIC <input type="checkbox"/> GLASS <input type="checkbox"/> PAPER <input type="checkbox"/> OTHER (Specify)	
3. LOCATION OF NET CONTENTS <input type="checkbox"/> LABEL <input type="checkbox"/> CONTAINER	4. SIZE(S) OF RETAIL CONTAINER		
5. LOCATION OF LABEL DIRECTIONS <input type="checkbox"/> ON LABEL <input type="checkbox"/> ON MATERIAL ACCOMPANYING PRODUCT	6. MANNER IN WHICH LABEL IS AFFIXED TO PRODUCT <input type="checkbox"/> LITHOGRAPH <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/> PAPER GLUED <input type="checkbox"/> STENCILED		

SECTION IV

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NAME G. E. Brussell			
TITLE Manager, Registrations		TELEPHONE NO. (Include Area Code) 816-242-2383	
2. SIGNATURE <i>G. E. Brussell / 8/1</i>	3. TITLE Manager, Registrations		
4. TYPED NAME G. E. Brussell	5. DATE SIGNED 7/1/85		

©NEMACUR 15% Granular  
EPA Reg. No. 3125-236

1. SUBJECT OF AMENDMENT (Continued)

The Agency has established a tolerance at a level of 0.5 ppm for residues of NEMACUR fenamiphos and its sulfone and sulfoxide metabolites in or on garlic. This tolerance was established to cover residues in or on garlic imported into this country. From studies conducted in California under direction of the IR-4 Technical Committee, it has been found that residues resulting from the use of NEMACUR 15% Granular to control nematodes in domestic garlic are less than 0.5 ppm. A copy of the data obtained in the IR-4 tests is enclosed. As a result of this work, the IR-4 Technical Committee requested that Mobay apply for registration of NEMACUR 15% Granular for use on garlic. The proposed claims for this use are set forth in the enclosed draft label amendment dated 6/25/85.

We request that the Agency waive the requirement of efficacy data for this application in accordance with the statutory authority conveyed by FIFRA, as amended.

Included with this application is a completed and signed "Certification with Respect to Citation of Data and General Offer to Pay" in compliance with PR Notice 85-3. As indicated, we are proceeding under the "Cite-All" method of support. The most recent list of pesticide data submitters dated May 8, 1984 shows that only Mobay and Pineapple Growers Association of Hawaii (PGAH) have submitted data on fenamiphos (Chemical No. 100601). Although it is our opinion that the PGAH data are not relevant to this application, we note that we have previously submitted a letter which authorizes the Agency to review PGAH data in connection with the review of registration applications for fenamiphos submitted by Mobay.

If, during the course of the Agency's review of this application, pertinent comments or questions arise, we would like to receive a copy of the actual review notes. Having a copy of the actual notes aids us in formulating timely replies to the Agency.

YLD22

U.S. LABEL

Reason to Issue: To propose use on garlic. Date of Draft: 6/25/85 (Pre-Reg) (H)

EPA Reg. No. 3125-236-AA

® NEMACUR 15% Granular

SYSTEMIC INSECTICIDE - NEMATOCIDE

ACTIVE INGREDIENT:

Ethyl 3-methyl-4-(methylthio)phenyl  
(1-methylethyl)phosphoramidate ..... 15%

INERT INGREDIENTS: ..... 85%  
100%

AMENDMENT TO PREVIOUSLY REGISTERED LABELING

Add the Following:

DIRECTIONS FOR USE

CROP	PEST	DOSAGE NEMACUR 15% G.	REMARKS
Garlic	Stem and Bulb Nematode	9.2 - 18.4 ozs./1,000 ft. of row for any row spacing (15 to 30 lbs. per acre on 40 inch beds with two seed lines [rows] per bed)	Apply specified dosage in-furrow with the garlic seed (cloves) at planting. For best results, plant the crop within 7 to 10 days after cracking (seed preparation).