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

594A
CASWELL FILE

OCT 29 1990

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Tetrahydroazadirachtin: Supplemental Information to Further Support the Classification of Subject Compound as a Biochemical Pesticide (I.D. No. 000023-NPI; Record No. 267,927; MRID No. N/A; HED Project No. 0-1665; Caswell No. 594A)

TO: Phil Hutton/Willie Nelson (PM-17)
Registration Division (H7505C)

FROM: J. Thomas McClintock, Ph.D., Microbiologist
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

THROUGH: Reto Engler, Ph.D., Chief *Escherichia coli* 10/29/90
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

BACKGROUND INFORMATION: SACB and the OPP Biotechnology Workgroup previously confirmed the classification of azadirachtin as a biochemical pesticide (see 2/16/90 memorandum from J. T. McClintock to P. Hutton/W. Nelson). In that memorandum SACB requested supplemental information from the registrant (NPI) on the manufacturing process for tetrahydroazadirachtin and, for comparative purposes, the chemical structures of both compounds (azadirachtin and tetrahydroazadirachtin). Based on the information submitted by the registrant, SACB recommended that tetrahydroazadirachtin, the hydrogenated form of azadirachtin, be classified as a biochemical pesticide (see 3/12/90 memorandum from J. T. McClintock to P. Hutton/W. Nelson).

DISCUSSION/CONCLUSIONS: The information on the manufacturing process of tetrahydroazadirachtin contained in the present action is identical to that previously reviewed by SACB and the OPP Biotechnology Workgroup. Consequently, SACB is unclear as to the purpose of this action and would request that the purpose of this action be clarified by the Product Manager.