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

594A
CASWELL FILE

JAN 17 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Margosan-O Product Label Amendment: Addition of
Greenhouse Use and Targeted Pests (HED Project No. 0-
1137; I.D. No. 11688-5; Record No. 263039; Caswell No.
594A)

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

FROM: J. Thomas McClintock, Ph.D., Microbiologist
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THROUGH: Reto Engler, Ph.D., Chief
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JTM
1/15/91
[Signature]

ACTION REQUESTED: W. R. Grace and Company has requested a product label amendment for Margosan-O (EPA Registration No. 11688-5). The proposed changes are: 1) to simplify the format and language of directions for use, 2) to add "interiorscapes" as a use site, 3) to delete the phrase "Do not apply to open blooms" under directions for use, 4) add "For low volume application, provide 10.6 g active ingredient (equivalent to 7.5 pints Margosan-O) per acre." and 5) addition of targeted pests.

DISCUSSION/CONCLUSION: Margosan-O contains the biochemical azadirachtin, a naturally occurring insecticide which is extracted from the Neem tree seed. Due to the low volume use pattern HED/SACB would support the amendments to the proposed label. Such amendments should not pose any additional human health risks arising from exposure of the compound to non-food crops.