

US EPA ARCHIVE DOCUMENT

JAN 18 1991

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RECORD NO.

121701  
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 4-22-90 OUT JAN 18 1991

FILE OR REG. NO 11688-5

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

DATE OF SUBMISSION 4-19-90

DATE RECEIVED BY EFED 4-19-90

RD REQUESTED COMPLETION DATE 7-17-90

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

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

PRODUCT MANAGER NO. 17 (W.Nelson)

PRODUCT NAME(S) MARGOSAN-O (AZADIRACHTIN)

COMPANY NAME W.R. GRACE & CO, - Conn.

SUBMISSION PURPOSE LABEL AMENDMENTS

SHAUGHNESSEY NO.	CHEMICAL AND FORMULATION	% A.I.
<u>121701</u>	<u>AZADIRACHTIN</u>	<u>0.3%</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____



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

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

JAN 18 1991

MEMORANDUM

**SUBJECT:** Request for Label Amendments to Margosan-O by  
W.R. Grace & Co.

**FROM:** Zig Vaituzis, Microbiologist  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

**THRU:** Leslie W. Touart, Head Section #1  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

James W. Akerman, Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

**TO:** Phil Hutton, PM Team 17  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

BACKGROUND

W.R. Grace & Co. have applied for a label amendment for their "Botanical Insecticide" MARGOSAN-O Concentrate (0.3% azadirachtin as the a.i.). The label (in part) reads as follows:

For effective management of whiteflies, thrips, mealybugs, leafminers, loopers, caterpillars, and gypsy moths on ornamentals, trees, and shrubs, in and around greenhouse, commercial nurseries, and commercial and residential landscape. Do not use on food crops.

Environmental Hazards:

**CAUTION:** This product may be hazardous to fish and aquatic invertebrates. Do not apply directly to or allow run-off into ponds, lakes, streams, or wetlands. Do not contaminate water by cleaning of equipment or disposal of water.

Among the use directions the label contains the following statement:

"do not apply to open blooms, to wilted or otherwise stressed plants, or to newly transplanted material prior to root establishment..."

W.R. Grace & Co. want to drop the term "do not apply to open blossoms" from their new label.

RECOMMENDATIONS:

1. The Environmental Hazard statement "do not contaminate water by cleaning of equipment or disposal of water" should be changed to read:

"Do not contaminate water when disposing of equipment washwaters".

2. The statement "do not apply to open blossoms" has to remain on the label until a honey bee study is submitted and reviewed by EEB.