

US EPA ARCHIVE DOCUMENT

D168660, 168669, 168673, 168699

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SHAUGHNESSY NO

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REVIEW NO.

EEB REVIEW

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DP TYPE 001 - Submission Related Data package

PRODUCT MANAGER, NO. S. Lewis (21)

PRODUCT NAME(S) Nova 40W; Rally 40W

TYPE PRODUCT F R I N H D Fungicide

COMPANY NAME Rohm and Haas

SUBMISSION PURPOSE Response to EEB review of proposed

INCLUDE USE(S) use on pome fruits and almonds

COMMON CHEMICAL NAME Myclobutanil



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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Myclobutanil--Response to Rebuttals
DP Barcodes: D168673, D168699, D168669, and D168660
ID No: 000707-00215

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

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

Rohm and Haas Company has submitted a rebuttal to the previous EEB reviews of myclobutanil use on almond nuts and hulls and pome fruits. In their rebuttal Rohm and Haas states that 13 days is a more appropriate value to employ as a half-life in a risk assessment than the 66 day half-life that EEB used. The chemical company calculated the 13 day half-life by averaging plant residue data {apples (Acc. No. 00143768), cherries (MRID No. 40791606), plums (MRID No. 40791610), peaches (MRID No. 40791605), and grapes (Acc. No. 266117)} while EEB's half-life was the average of aerobic soil half-lives.

The residue studies on cherries, plums, and peaches are from Craven Laboratories. EPA has received allegations concerning the reliability of certain residue studies conducted by Craven Laboratory Inc. Until the issues surrounding the validity of data generated by Craven Laboratories are resolved, the EPA will not rely on Craven data for regulatory decisions. If Rohm and Haas wishes to employ other residue data, (which, if desired, may include apples and grapes) EEB will consider the relevance of this data to its reviews on almond nuts and hulls and pome fruits.

If you have any questions, please call Heather Mansfield at 305-5064.

