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

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID #000707-EUP-121 (CBTS #11168; Barcode #D186822).
Fenbuconazole (RH-7592, Fenethanil, Indar® 2F). Review
of Amendment to Change Formulation (MRID #'s 426157-00
and -01).

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Tolerance Petition Section II
Chemistry Branch I- Tolerance Support
Health Effects Division (H7509C)

THRU: Debra Edwards, Ph.D., Chief
Chemistry Branch I- Tolerance Support
Health Effects Division (H7509C) *at 1/4 inch for*

TO: Cynthia Giles-Parker, PM#22
Herbicide-Fungicide Branch
Registration Division (H7505C)

Rohm and Haas has submitted an amendment to change the formulation used in their current EUP for use of fenbuconazole on the stone fruit crop group from RH-7592 2F to the new formulation RH-7592 75WP in a water soluble pouch.

Under the proposed EUP, 605 lbs of formulated product (453.5 lbs ai) will be shipped for use on 605 acres through October 1993. [The EUP for the 2F formulation which was to extend to 10/31/93 allowed use of 234.4 gallons of RH-7592 2F (468.5 lb ai) per year on 625 acres per year.]

The lbs ai/A rates for the 75WP formulation are 0.07-0.12 lb ai/A or 0.12 lb ai/A. The corresponding rates for the 2F formulation are 0.066-0.1 lb ai/A or 0.125 lb ai/A. These differences are not significant.

The application rate on the 75WP label is expressed as oz. product per acre and lb ai per acre. The application rate on the 75WP label should also be expressed in terms of lbs ai per 100 gals spray solution to run-off. Otherwise, no significant differences exist in the 2F and 75WP labels (regarding uses, application rates, and other label directions).

In a meeting with Rohm and Haas on 10/27/92, CBTS indicated



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contains at least 50% recycled fiber

that residue data on the 2F formulation would be adequate to support the 75WP for an EUP for fenbuconazole on stone fruits.

Conclusions

1. CBTS defers to Registration Division concerning whether the inerts in RH-7592 75WP are cleared.
2. The application rate on the 75WP label is expressed as oz. product per acre and lb ai per acre. The application rate on the 75WP label should also be expressed in terms of lbs ai per 100 gals spray solution to run-off.
3. Other than the issue discussed in Conclusion #2 above, no significant differences exist in the 2F and 75WP labels (regarding uses, application rates, and other label directions).

Recommendations

Provided TOX and RD have no objections and provided Conclusions 1 and 2 above are addressed, CBTS recommends for the proposed conversion of the current EUP for fenbuconazole on stone fruits from the 2F to the 75WP formulation.

For a permanent tolerance, bridging studies would be needed as described in R. Loranger's memo dated 9/17/92 (PP#9G3746).

Note to PM: CBTS is not reviewing the data in MRID #426157-01 since it contains Product Chemistry data for a formulation (RH-7592 75% Wettable Powder in a Water Soluble Pouch). Product Chemistry data for formulations are reviewed by Registration Division.

cc: RF, SF, Circu., N. Dodd (CBTS), E. Haeberer (CBTS),
PP#9G3746, PP#1F3989, PP#1F3995

RDI: E. Haeberer:3/4/93: R. Loranger: 3/5/93
H7509C:CBTS:CM#2:Rm804F:305-5681:N. Dodd:nd:3/8/93