



**US Environmental Protection Agency
Office of Pesticide Programs**

Petition for Buprofenzin

September 2007

Sent Via FEDEX

September, 2007

Mr. John Jamula
Information Technology and Resource Management Division
Office of Pesticide Programs (7504P)
Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, DC 20460

RE: Request for Exclusive Use Status for Studies Conducted with Buprofezin
On Minor Crops Per FIFRA § 3 (c) (1) (F) (ii)
Buprofezin (CAS No. 69327-76-0); EPA Chemical Number 275100
Nichino America, Inc. (EPA Reg No. 71711)

Dear Mr. Jamula:

We believe Nichino America, Inc. is entitled to exclusive use for the attached studies conducted on minor crops with buprofezin and we wish all appropriate data protection per FIFRA § 3 (c) (1) (F) (ii). A minor use extension affords for a period of 3 years after the exclusive use classification has expired, if 9 or more representative crops in each crop grouping have been granted. The total number of representative crops is 25. Please review the attached letter to Mr. Richard Gebken, PM-10, where we requested the exclusive use status.

We appreciate it if the data be clearly marked as exclusive use on the EPA data Submitters' List, per FIFRA § 3 (c) (1) (F) (ii).]

We appreciate your review of this request. If you have any questions, you are welcome to call me at (302) 636-9001 extension 3 or email at mmaks@nichino.net. Thank you.

Sincerely,



Marie A. Maks
Senior Manager, Regulatory Affairs
Nichino America, Inc.

Cc: Ms. Lois Rossi Director of Registration
Mr. Richard Gebken, Acting PM 10

**BUPROFEZIN DATA AFFORDED EXCLUSIVE USE
PER FIFRA § 3 (c) (1) (F) (ii)**

Buprofezin: Magnitude of Residue on Avocado	IR-4 Study No. 07740	46031401
Buprofezin: Residue Levels on Greenhouse-Grown Tomatoes from Side-by-Side Trials Conducted in the U.S. During 2005	SARS-05- 18	46689301
At harvest buprofezin-derived residues in or on greenhouse grown tomatoes following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1994	R-39	44576918
At harvest buprofezin-derived residues in or on field grown tomatoes following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1995	R-55	44576926
At harvest buprofezin-derived residues in or on processed tomato commodities following sequential applications of applaud at an exaggerated rate, 1994.	BF-94R- 02	44576927
Buprofezin: Magnitude of Residue on Peaches	IR-4 Study No. 07517	46026101
Buprofezin: Magnitude of the Residue on Cherry	IR-4 Study No. 07250	46629802
Buprofezin: Magnitude of the Residue on Olives	IR-4 Study No. 09015	47112002
Buprofezin: Magnitude of the Residue on Plum (Amended)	IR-4 Study No. 07519	46629801
Buprofezin: Magnitude of the Residue on Papaya (Amended)	IR-4 Study No. 07024	46629701
Buprofezin: Magnitude of the Residue on Peppers (Bell & Non-Bell)	IR-4 Study No. 08848	47204702
Buprofezin: Magnitude of the Residue on Strawberry	IR-4 Study No. 08737	47112001
Buprofezin: Magnitude of the Residue on Tomato	IR-4 Study No. 08964	47204701
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Spinach from Trials Conducted in the United States	SARS-04- 10	47112003
Buprofezin and BF09 & BF12 Metabolites: Reside Levels on Tomato from Trials Conducted in the United States During 2003	ML03- 1702-NAI	

Metabolism of [14C]-buprofezin in citrus (lemons)	R-34	44576906
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Tomatoes from Trials Conducted in the United States.	SARS-03-15	46567301
At harvest buprofezin-derived residues in or on almonds following a single application of Applaud 70WP at its highest recommended rate and shortest pre-harvest interval, USA, 1996	R-61	44576923
At harvest buprofezin-derived residues in or on lettuce following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1994	R-43	44394055
At harvest buprofezin-derived residues in or on leaf lettuce following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1995	R-42	44394054
To Determine the Magnitude of Buprofezin Residues at Intervals and Harvest in the Raw Agricultural Commodity Outdoor Tomato and the Processed Fractions Resulting from two Directed Applications of Either Buprofezin 25 WP or Buprofezin 25 SC, in Southern France and Spain in 2002	R-1126	47178401
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Celery from Trials Conducted in the United States From 2004	SARS-04-09	47112004
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Spinach from Trials Conducted in the United States from 2004	SARS-04-10	47112004
At harvest buprofezin-derived residues in or on melons (cantaloupe) and summer squash following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1994	R-37	44394053
At harvest buprofezin-derived residues in or on cucumber following sequential applications of Applaud at its highest recommended rates and shortest pre-harvest interval, USA, 1994	R-44	44394056
The disposition and metabolism of buprofezin in the tomato	R-27/M-5	44435903
Stability of Residues of Buprofezin and Its Pertinent Metabolites During Frozen Storage in Several Raw Agricultural and Processed Commodities	MLI-03-02	46804701
Buprofezin: Residue Levels on Apples and Processed Commodities, Juice, and Wet Pomace from Trials Conducted in the United States During 2001	SARS-01-014	46007202
Buprofezin and Its Metabolites BF-09 and BF-12: Independent Laboratory Validation of Methodology for the Determination of Residues of Buprofezin and Its Metabolites BF-09 and BF-12 in Apples and Tomatoes	R-1051	47159103

Magnitude of Residues of Buprofezin on Peaches	IR-4 Study No. 07517	46026101
Magnitude and decline of the residue of buprofezin and its metabolites in grape raw agricultural commodities following applications of Courier 70WP, USA, March 2004	TCI-03-082	47159101
Magnitude and decline of the residue of buprofezin and its metabolites in grape raw agricultural commodities following applications of Applaud® 70 WP	TCI-04-088	46629901
Buprofezin: Magnitude of the Residue on Pear, Vol 2, Amendment, MRID 46007201, USA, February 2004	IR 4-07518	
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Almond Hulls from a Trial Conducted in the United States During 2003	SARS-03-13	46274501
Buprofezin and BF09 & BF12 Metabolites: Residue Levels on Banana from a Trial Conducted in the United States During 2003	SARS-03-14	46274502
Magnitude of the Residue of Buprofezin and Its Metabolites in Cotton Raw Agricultural Commodities Following Applications of Courier 70 WP and Courier 40 SC	TCI-03-081	46274503
Magnitude of the residue of buprofezin in/on bananas after 4 applications of Applaud 70WP	R-45	44576928
Buprofezin: Magnitude of the Residue of Guava	IR-4 07403	
Buprofezin: Magnitude of the Residue of Lychee	IR 07739	45538801
At harvest buprofezin-derived residues in or on processed grape commodities following sequential applications of Applaud at its exaggerated rate, USA, 1996	BF-96R-05	44576920
At harvest buprofezin-derived residues in or on processed tomato commodities following sequential applications of Applaud at its exaggerated rate, USA, 1994	BF-96R-02	44576927
Buprofezin: Residue Levels on Apples and Processed Commodities, Juice and Wet Pomace from Trials Conducted in the United States During 2001	R-1113	46007202
Buprofezin: Magnitude of the Residue on Lychee	FL17	45538801
Buprofezin: Magnitude of the Residue on Snap Beans	FL12	45679901
Buprofezin: Magnitude of the Residue on Tomato (Greenhouse), IR-4 Study 07406, USA, 2002	R-38	45782401
Metabolism of [14C]-buprofezin in lettuce		44394049