TO: Phillip Poli  
Product Manager  
Registration Division (H7505C)

FROM: Michael Barrett, Acting Section Head  
Ground-Water Technology Section  
Environmental Fate & Ground-Water Branch, EFED (H7507C)

THRU: Henry Jacoby, Chief  
Environmental Fate & Ground-Water Branch/EFED (H7507C)

Attached, please find the EFGBW review of:

Reg./File #: 256590 (record no.)

Chemical Name: simazine

Type Product: herbicide

Company Name: Ciba-Geigy Corp.

Purpose: Request for time extension and reduction in data requirements for the simazine use and monitoring data called in.

Date Received: 1/3/90  
ACTION CODE: 870

Date Completed: 1/10/90  
EFGWB #(s): 90-0224

Monitoring study requested: 
Total Review Time: 0.5d

Monitoring study voluntarily: 

Deferrals To: Biological Effects Branch
Science Integration & Policy Staff, EFED
Non-Dietary Exposure Branch, HED
Dietary Exposure Branch, HED
Toxicology Branch, HED
EFGWB Response to 12/7/89 Letter from Ciba-Geigy Corp. Concerning 90-Day Response  
Simazine Special Data Call-In

The Environmental Fate & Ground Water Branch believes that it is acceptable to  
grant the registrant extensions on data submissions under certain conditions. EFGWB  
has records indicating that submission of a reduced data set defining simazine use in  
the United States was proposed by Ciba-Geigy in a September 28, 1989 meeting with  
Office of Pesticide Programs personnel. Although an EFGWB representative agreed that  
providing the data as originally requested would be quite difficult, no comments have  
been forwarded to Ciba-Geigy Corp. on the acceptability of the revised data reporting  
form that they proposed. EFGWB will be consulting with Benefits and Economic Analysis  
Division concerning what level of detail is likely to be feasible. A possible  
compromise use data submission format follows:

1. Provide total use data by county for the states of FL and CA. For these states,  
use data must be sorted by crop/site for any crop/site that represents 10% or more of  
the total use in the county.

2. For all states, provide use information sorted by aquatic and non-aquatic use.

3. Discuss trends in simazine use (change in total pounds sold and in important crops  
by state or at least by geographic region) over the last 10 years.

4. For the 10 states with the highest volume of use, determine the 10 counties with  
the highest volume of use and provide some measure of use in each of these counties.  
If the registrant believes that obtaining actual use information for counties in these  
states involves an unreasonable amount of effort and the Agency agrees, then use of  
sales information from agricultural chemical dealers as a surrogate for use will be  
considered. If sales information is not available for recent years, then the Agency  
will consider granting an extension to the registrant to sometime in the Fall of 1990  
to allow the registrant time to collect sales data for the relevant counties for 1990.  
Interview with county extension agents and other knowledgeable persons should be  
conducted in each of these counties to determine what the major use sites are in each  
county.

Please note that the above suggestions are still subject to change, EFGWB will make  
forma recommendations within the next 2 weeks.

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