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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Simazine. Telecon with SRRD and Registrant.

From: Michael S. Metzger, Chemist *Michael S. Metzger*  
Chemistry Branch II - Reregistration Support  
Health Effects Division (H7509C)

Thru: Edward Zager, Chief *E. Zager*  
Chemistry Branch II - Reregistration Support  
Health Effects Division (H7509C)

To: Venus Eagle  
Special Review and  
Reregistration Division (H7508W)

CBRS (M. Metzger, 9/28/92) participated in a telecon with Venus Eagle (SRRD) and Tom Parshley (Ciba-Geigy) regarding data requirements for the triazine herbicide simazine. CBRS made the following commitments pending management approval:

- Mr. Parshley stated that the radiolabel field studies for atrazine showed no variability in either the level of the total radioactive residue or in the ratio of metabolites among the 3 geographical locations in which studies were done. Based on this information, as well as on the similar structures of atrazine and simazine, CBRS agreed that a single radiolabel field study for simazine on corn performed in IL would suffice for this commodity.
- Mr. Parshley stated that the types of commodities for which simazine registrations will be maintained include (1) corn, (2) orchard fruits and tree nuts, and (3) small fruits and berries. A radiolabel field study is currently underway for citrus in CA. CBRS stated that an additional study on apples carried out in NY would suffice for orchard fruits and tree nuts.
- No agreement was reached regarding appropriate representative commodities representing small fruits and berries for which radiolabel field studies will be

required. Mr. Parshley stated that this issue would be further discussed within the company.

- Mr. Parshley objected to the data requirement for a ruminant metabolism study in which radiolabeled simazine (parent) is fed. He stated that an old study is available, and that most of the terminal residue in animal feed is comprised of non-chloro metabolites. CBRS agreed that, considering the available ruminant metabolism study for simazine as well as several ruminant metabolism studies for atrazine, the company could submit a hydroxysimazine ruminant metabolism study to supplement the available data. The company will also resubmit the old simazine metabolism study including all appropriate raw data.

If (1) registered uses of simazine other than those discussed above remain, (2) the field radiolabel studies for simazine discussed above are inadequate, or (3) the radiolabel field studies for atrazine on corn show variable levels of total radioactivity or variable metabolite ratios, additional data may be required.

cc: Simazine SF, Registration Standard (List A) File, RF, M. Metzger, M. Beringer (CCB/HED), K. Pearce (SRB/SRRD), circu H7509C:CBRS:M.Metzger:MM:Rm816G:CM#2:9/28/92:(703)305-5883