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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Alachlor(090501) - Answers to Questions
from 4/10/87 meeting between David Giamporcaro (SRB)
and Monsanto Representatives
[No MRID No.; RCB No. 2287]

FROM: Susan V. Hummel, Chemist
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THRU: Edward Zager, Section Head
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EZ

TO: David Giamporcaro, RM #79
Special Review Branch
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A meeting was held between David Giamporcaro, SRB, Matt Lorber, EAB, and Monsanto representatives: Mr. Lyle Gingrich, Mr. Frank Serdy, and Mr. Robert Street. Monsanto had several questions regarding the RCB review dated 12/24/86 (S. Hummel). RCB was not at attendance at the meeting.

The questions will be stated first, followed by our response.

Question 1

Would a residue analysis on post emergence directed treatment of 35" corn (layby application directed to the base of the plant) satisfy the requirement for data on the post emergence broadcast treatment of 5" corn?

RCB Response

No. Residue data are needed on each type of application which is registered.

Question 2

Would the Agency deem it practical to include a label statement restricting the use of corn that has received post emergence treatment with alachlor from use as silage, in lieu of generating residue data on corn silage?

RCB Response

Although corn silage is listed as a rac in the Residue Chemistry Guidelines, residue data on corn silage are not ordinarily required. Residues in corn silage would be covered by a tolerance in corn forage and fodder. Residue data on alachlor treated corn silage are not required. Of course, the registrant is free to conduct field trials for corn silage, which may show a decrease in residues. Any residue data generated would be considered in devising a livestock diet for estimation of residues in meat and milk.

Question 3

In the processing study for corn, would the Agency prefer taht corn grain samples be dried before freezing, or should the grain samples be frozen immediately after harvest, and then dried prior to processing? Mr. Serdy noted that the raw agricultural commodity ordinarily contains about 30% moisture, and is dried to 14% moisture before processing.

RCB Response

The corn grain samples should be frozen immediately after harvest and analyzed before processing. The samples would then be processed and analyzed again. The processing would include any drying normally done at the beginning of the processing.

Question 4

The compnay treated peanuts being grown for processing at a rate of 8 pounds of alachlor at cracking. Is this single treatment and rate of applcation satisfactory to the Agency to support two sequential applications at 4 pounds per acre, or should the peanuts be replanted and different treatment and applications rates be used?

RCB Response

Residue data are needed for each type of application which is registered. Residue data are needed for the sequential treatments. the registrant should also be reminded that the geographical representation for the residue data submitted on peanuts was not adequate. Residue data for the 8

lb application at cracking are still needed from NC/VA. Adequate geographical representation is needed for all residue data.

Monsanto comment

Mr. Serdy stated that Monsanto will only support preplant incorporation (PPI) on legumes, and will not pursue a crop group tolerance for legumes. The company will conduct PPI trials on red kidney beans in IL, CO, NE, and ID.

RCB Comment

The data requirements RCB gave for a crop group tolerance were meant to be informational. Residue data on snap beans will not be required if a crop group tolerance is not desired.

If only preplant incorporated application is to be supported on legumes, then an amendment deleting directions for use for preemergence application on legumes is needed. The proposed additional residue data on red kidney beans from IL, CO, NE, and ID, when combined with residue data already received, will be adequate geographical representation. This was indicated in our review of the protocol for field trials (4/23/86, M. Loftus) and in our review of the protocol for processing studies (S. Hummel, 12/24/86).

cc: R. F., circo, S. Hummel,alachlor S.F., Alachlor S.R.F.,
PM#25, C. Monroe (SIS), PMSD/ISB
RDI:EZ:06/11/87:RDS:06/12/87
TS-769:RCB:SVH:svh:RM810:CM#2:06/11/87