

US EPA ARCHIVE DOCUMENT

PM  
1-26-76

EEE BRANCH REVIEW

DATE: IN \_\_\_\_\_ OUT \_\_\_\_\_ IN \_\_\_\_\_ OUT \_\_\_\_\_ IN 8/8/75 OUT 1/26/76  
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 524-308

PETITION OR EXP. PERMIT NO. \_\_\_\_\_

DATE DIV. RECEIVED 3/26/75

DATE OF SUBMISSION 3/20/75

DATE SUBMISSION ACCEPTED \_\_\_\_\_

TYPE PRODUCT(S): I, D, (H) F, N, R, S Herbicide

PRODUCT MGR. NO. \_\_\_\_\_

PRODUCT NAME(S) Roundup (GLYPHOSATE)

COMPANY NAME Monsanto Agriculture Products Co.

SUBMISSION PURPOSE Label Modification Non-Crop Sites

CHEMICAL & FORMULATION Isopropylamine Salt of N-phosphonomethyl glycine  
Water Sol. Conc. 3 lb/gal. acid equivalent

200.0 Introduction

This review is concerned with the Monsanto request of March 20, 1975 to make certain changes in their presently approved Roundup label. Specifically these changes are:

1. Addition of a second sentence to the explanatory statement regarding the active ingredient, and
2. The highlighting of certain weeds in the currently approved list by describing rates and application details so that optimum efficacy may be achieved.

200.1 Proposed Changes

Addition of a second sentence to the explanatory statement (\*) regarding the active ingredient as follows: "Equivalent to 359 grams per liter or 3 pounds per U. S. Gallon of the acid, glyphosate." See current and proposed labels, attachments 1 and 2.

The second change involves the addition of six short paragraphs to the Control of Perennial Weeds section of the label as detailed in Table 1 (USE SHEETS).

201.0 Data Summary

Results of efficacy studies at numerous locations as given by Registrant are contained in Attachments 3 - 7. Entries specifically covering the recommended usage rates indicated on the proposed label or rates that bracket these recommendations have been summarized in Table 1.

202.0 Conclusions

Requested label changes improve use section clarity and should result in more efficient use of the herbicide. Expansion of the weed control section to include paragraphs on selected species is justified by both the current efficacy data as well as that previously submitted by registrant to support the currently approved label.

Failure of the registrant to include efficacy data for the selected weed species on all currently registered sites does not constitute sufficient cause to disallow the proposed label changes.

The expanded label will provide the applicator with information necessary to control the selected weed species and accordingly should reduce or eliminate ineffective or excessive applications of the herbicide. From an efficacy viewpoint, the label changes discussed in this review are supported by data submissions and the request to amend the Roundup label should be granted.

202.1 Claims supported by the data submitted

Claims in the current label for Perennial Weed control of Bermuda grass, Canada thistle, Field bindweed, Johnsongrass, Quackgrass and other perennials are supported by data submitted.

202.2 Claims not supported by the data submitted

Only 6 of the 16 industrial and non-agricultural uses on approved label were tested by registrant. No data in support of requested label changes for the following uses were submitted: pipeline, highway, power and telephone rights of way, petroleum tank farms and pumping installations, storage areas, lumberyards, parking areas, schools, parks, and golf courses.

202.3 Data Not Appropriate

Data on weed control in sugarcane, corn, orange, cotton, grape, etc. is not appropriate to current petition.

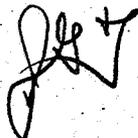
203.0 Recommendation

The proposed changes are acceptable since they coincide with labeling accepted December 23, 1975.

Bernard C. Smale  
Herbicide Efficacy  
EEE

1/27/76

WSW





GLYPHOSATE (cont)

USE	TOLERANCE P.P.M.	RATE		APPLICATION	LIMITATIONS AND REMARKS
		acid equiv. lbs/acre	formulation gts/A		
Johnsongrass		1.5 to 2.25 lbs	2-3 qts.	Spray when grass 12 inches or more in height. Delay application until approaches early head stage. Apply before Johnsongrass turns brown in fall.	Allow 7 days or more before tillage. Spray volumes in "Directions for use".
Quackgrass		1.5 to 2.25 lbs	2-3 qts	When most grass is at least 8 inches in height (3 to 4 leaf stage) and actively growing.	Allow 3 days or more before tillage.
Other perennials		2.5 to 3.75	3-5 qts	Apply when most have reached early head or early bud stage	Allow 7 days after application before tillage.

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Attachment 1

MIXTURE EQUIVALENT  
 1.175 LITERS PER 50 GALS. OF WATER

# PROUNIDOLE

POSTEMERGENCE HERBICIDE BY  
**Monsanto**

Postemergence herbicide for industrial and non-crop uses to control or destroy many annual and perennial grasses and broadleaved weeds.

**AVOID CONTACT WITH DESIRABLE PLANTS AND TREES SINCE SEVERE INJURY OR DESTRUCTION MAY RESULT.**

**CAUTION!** Keep out of reach of children.

**READ PRECAUTIONS ON BACK OF CAN.**

Use only according to label instructions.

Read "LIMIT OF LIABILITY AND LIABILITY" before buying or using. If terms are not acceptable, return at once unopened.

**ACTIVE INGREDIENT:** "propoxyphene salt of Glyphosate 41.0%  
**OTHER INGREDIENTS:** 59.0%  
 100.0%  
 \*Contains 480 grams per liter or 4 pounds of the active ingredient propoxyphene salt of N (glyphosate) per U.S. gallon.

In case of an emergency involving this product, call collect, day or night, (314) 694-1000.

EPA Reg. No. 524-308

MONSANTO COMPANY AGRICULTURAL DIVISION ST. LOUIS, MISSOURI 63166 U.S.A. EPA Est. 524-MD-1

**NET 5 U.S. GAL.**

"Label Text as Approved October 17, 1974"

NOTE: This is not a complete label. Only those sections being produced here changes are reproduced here.

**WEEDS CONTROLLED**

Roundup controls many annual and perennial grasses and broadleaf weeds. A partial list of ANNUAL WEEDS includes:

Annual Biograzers  
 Poa annua  
 Common Lambsquarters  
 Chenopodium album  
 Common Ragweed  
 Amaranthus retrofractus  
 Crabgrass  
 Digitaria spp.  
 Downy mildew  
 Bromus horridus  
 Panicum  
 Pennium spp.  
 Field Sandspur  
 Conyza bonariensis  
 Eragrostis  
 Foxtail  
 Setaria spp.  
 Giant Ragweed  
 Ambrosia trifida

Annual weeds generally will continue to germinate from seed throughout the growing season. In some cases, repeat treatments may be necessary to more completely control later germinating species. Best control is obtained if weed or grass growth is treated before seed heads emerge.

A partial list of PERENNIAL WEEDS includes:

Barnyardgrass  
 Cyperus esculentus  
 Kentucky Bluegrass  
 Poa spp.  
 Canada Thistle  
 Cirsium arvense  
 Common Nutsedge  
 Curly Dock  
 Rumex crispus  
 Dallisgrass  
 Paspalum dilatatum  
 Fescue  
 Falsaria spp.  
 Field Bindweed  
 Convolvulus arvensis

Johnsongrass  
 Sorghum halepense  
 Hemp Dogbane  
 Acaecium canadense  
 Milkweed  
 Acaecias spp.  
 Paragrass  
 Barnyard  
 Hawaiian  
 Quackgrass  
 Agropyron reppens  
 Styracis Sphenocarpus  
 Paspalum conjugatum  
 Vasegrass  
 Paspalum univitt

Perennial weeds, particularly perennials and deep rooted species, such as barnyardgrass, Canada thistle, field bindweed, hemp dogbane and others, may require repeat treatments for best control. If possible, grow the crop to approach early but not stage late bloom. Full bloom or early seed heads stage of maturity before treatment. Optimum control and lowest ground water contamination is achieved by spraying in the early stages of crop growth. If area to be sprayed has been mowed or grazed, a low nitrogen fertilizer should be applied to the soil.

**DIRECTIONS FOR USE**

Spray 200-250% spray or spray until contact is made. Do not spray to the point of runoff.

Do not spray on or over plants or animals. Do not spray on or over water.

**INDUSTRIAL AND NON-AGRICULTURAL USES**

To control annual and perennial weeds on non-crop areas such as roadsides, parking lots, lawns, golf courses, etc., apply 1.5 to 2.0 quarts of Prounidole per acre. For control of annual weeds on lawns, apply 1.5 to 2.0 quarts of Prounidole per acre. For control of perennial weeds on lawns, apply 2.0 to 4.0 quarts of Prounidole per acre. For control of annual weeds on golf courses, apply 1.5 to 2.0 quarts of Prounidole per acre. For control of perennial weeds on golf courses, apply 2.0 to 4.0 quarts of Prounidole per acre.

**FOR CONTROL OF PERENNIAL GRASSES AND BROADLEAF WEEDS:** Use 2.0 to 4.0 quarts of Prounidole per acre. For control of annual weeds, use 1.5 to 2.0 quarts of Prounidole per acre.

**FOR CONTROL OF ANNUAL GRASSES AND BROADLEAF WEEDS:** Use 1.5 to 2.0 quarts of Prounidole per acre. For control of perennial weeds, use 2.0 to 4.0 quarts of Prounidole per acre.

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CONTROL OF BERMUDAGRASS WITH ROUNDUP

Location	Exp. No.	Page	Formulation	Rate lbs. Glypho- sate/Acre	Qts. Roundup/ Acre	Gal./Acre Spray Vol.	Rating Interval Days	% Weed Control Bermudagrass
California	2360	1-5	Roundup (MON 2139)	2.0	2-2/3	65	52	95
California	2353	6-10	Roundup (MON 2139)	3.0	4	65	52	100
California	2465	11-12	Roundup (MON 2139)	6	8	65	52	100
California	2492	13-15	Roundup (MON 2139)	2	2-2/3	50	91	35
California	2051	20-29	Roundup (MON 2139)	2.5	3-1/3	50	91	45
California	2052	30-31	Roundup (MON 2139)	3	4	50	91	70
California	2059	32-34	Roundup (MON 2139)	4	4	50	91	94
California	2223	35-43	Roundup (MON 2139)	6	8	50	91	40
Florida	893	16-19	Roundup (MON 2139)	1	1-1/3	-	70	40
Florida	2051	20-29	Roundup (MON 2139)	2	2-2/3	-	70	50
Florida	2052	30-31	Roundup (MON 2139)	4X	5-1/3	-	70	55
Florida	2059	32-34	Roundup (MON 2139)	3	4	100	62	100
Florida	2223	35-43	Roundup (MON 2139)	4	5-1/3	100	62	100

\* INDICATES USUALLY FACTORY CONTROL AT PROPOSED LB PER ACRE RATES - MOST CASES APPROXIMATE & NOTED IN TABLE.

CONTROL OF CANADA THISTLE WITH ROUNDUP

Location	Exp. No.	Page	Formulation	Rate		Gal./Acre Spray Vol.	Rating Interval Days	% Weed Control Canada Thistle
				Lbs. Glypho- sate/Acre	Qts. Roundup/ Acre			
Colorado (Helkes)	1504	6-7	Roundup (MON 2139)	2	2-2/3	40	90	90
				4	5-1/3	40	90	100
Illinois	1504	6-7	Roundup (MON 2139)	0.8	1-1/4	20	45	51
				1	1-1/3	20	45	75
				1.3	1-3/4	20	45	96
				1.5	2	20	45	98
				2	2-2/3	20	45	98
Iowa	968	8-9	Roundup (MON 2139)	1	1-1/3	20	50	47
				1.5	2	20	50	87
				2	2-2/3	20	50	90
				2.5	3-1/3	20	50	97
				3	4	20	50	97
Iowa	967	10-11	Roundup (MON 2139)	1	1-1/3	20	55	0
				1.5	2	20	55	10
				2	2-2/3	20	55	22
				2.5	3-1/3	20	55	50
				3	4	20	55	47
Iowa	923	12-13	Roundup (MON 2139)	1	1-1/3	20	42	87
				1.5	2	20	42	92
				2	2-2/3	20	42	100
				2.5	3-1/3	20	42	100
				3	4	20	42	100
Iowa	921	14-15	Roundup (MON 2139)	1	1-1/3	20	79	5
				1.5	2	20	79	17
				2	2-2/3	20	79	27
				2.5	3-1/3	20	42	100
				3	4	20	42	100
Michigan (Sprinkle)	16-18	Roundup (MON 2139)	1	1-1/3	-	72	93	
			2	2-2/3	-	72	93	

(Thistle Bud Stage)

(Thistle 4-8 weeks tall) → \*

(Thistle Full Bloom)

(Thistle 2-6 weeks tall) \*

(Thistle 10-24 weeks tall)

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CONTROL OF FIELD BINDWEED WITH ROUNDUP

Location	Exp. No.	Page	Formulation	Rate		Gal./Acre Spray Vol.	Rating Internal Days	% Weed Control Bindweed
				Ibs. Glypho- sate/Acre	Qts. Roundup/ Acre			
California California California	2498	1-2	Roundup (MON 2139)	3	4	100	47	100
	2497	3-4	Roundup (MON 2139)	3	4	100	45	100
	2487	5-6	Roundup (MON 2139)	3	4	100	89	100
Iowa	2160	7-9	Roundup (MON 2139)	6	8	100	89	100
				1	1-1/3	100	53	50
New York	2091	10-12	Roundup (MON 2139)	1.5	2	100	53	50
				2	2-2/3	100	53	70
New York	2092	13-14	Roundup (MON 2139)	1	1-1/3	19	78	95
				2	2-2/3	19	78	95
New York	2093	15-19	Roundup (MON 2139)	4	5-1/3	19	78	85
				1	1-1/3	19	78	65
New York	2094	20-24	Roundup (MON 2139)	2	2-2/3	19	78	70
				4	5-1/3	19	78	77
New York	2096	25-27	Roundup (MON 2139)	1	1-1/3	19	78	77
				2	2-2/3	19	78	95
New York	2097	28-30	Roundup (MON 2139)	4	5-1/3	19	78	97
				1	1-1/3	19	78	70
New York	2098	31-37	Roundup (MON 2139)	2	2-2/3	19	78	93
				4	5-1/3	19	78	96

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CONTROL OF JOHNSONGRASS WITH ROUNDUP

Location	Exp. No.	Page	Formulation	Rate		Gal./Acre Spray Vol.	Rating Interval Days	% Weed Control Johnsongrass
				Ibs. Glypho- sate/Acre	Qts. Roundup/ Acre			
Alabama	311	1-3	Roundup (MON 2139)	1	1-1/3	38	27	97
				1.5	2	38	27	100
				2	2-2/3	38	27	100
				4	5-1/3	38	27	100
Alabama	219	4-8	Roundup (MON 2139)	1	1-1/3	38	87	100
				1.5	2	38	87	100
				2	2-2/3	38	87	100
				4	5-1/3	38	87	100
Arkansas	66	9-31	Roundup (MON 2139)	2	2-2/3	20	33	98
				4	5-1/3	20	33	99
				2	2-2/3	20	122	88
				1.5	2	50	36	95
Arkansas	67	32-33	Roundup (MON 2139)	0.5	2/3	30	207	90
				1	1-1/3	30	207	95
				1.5	2	30	207	98
				0.5	2/3	30	268	99
Illinois	1508	34-35	Roundup (MON 2139)	1	1-1/3	30	268	99
				1.5	2	30	268	99
				0.5	2/3	30	268	99
				1	1-1/3	30	268	99
Kansas	1163	36-39	Roundup (MON 2139)	1.5	2	30	268	99
				0.5	2/3	30	268	99
				1	1-1/3	30	268	99
				1.5	2	30	268	99
Kentucky	618	45-46	Roundup (MON 2139)	1	1-1/3	20	22	75
				1.5	2	20	22	90
				2	2-2/3	20	22	95
				2.5	3-1/3	20	22	98
Kentucky	616	47-48	Roundup (MON 2139)	1	1-1/3	20	16	92
				2	2-2/3	20	16	100
				3	4	20	16	100
				4	5-1/3	20	16	97

CONTROL OF QUACKGRASS WITH ROUNDUP

Location	Exp. No.	Page	Formulation	Rate lbs./Glypho- sate/Acre	Rate Qts. Roundup/ Acre	Gal./Acre Spray Vol.	Rating Interval Days	% Weed Control Quackgrass
IOWA	2149	1-4	Roundup (MON 2139)	1	1-1/3	20	283	99
				1.5	2	20	283	99
IOWA	2150	5-8	Roundup (MON 2139)	2	2-2/3	20	283	99
				1	1-1/3	20	279	99
				1.5	2	20	279	99
IOWA	2153	9-11	Roundup (MON 2139)	2	2-2/3	20	279	99
				1	1-1/3	20	173	92
				1.5	2	20	173	90
IOWA	2155	12-14	Roundup (MON 2139)	2	2-2/3	20	173	93
				1	1-1/3	20	313	96
				1.5	2	20	313	99
IOWA	2156	15-17	Roundup (MON 2139)	2	2-2/3	20	313	99
				1	1-1/3	20	313	99
				1.5	2	20	313	99
MICHIGAN	3001	18-25	Roundup (MON 2139)	1	1-1/3	20	383	78
				1.5	2	20	383	95
MICHIGAN	3002	26-33	Roundup (MON 2139)	2	2-2/3	20	383	91
				1	1-1/3	20	174	86
				1.5	2	20	174	93
MICHIGAN	3003	34-41	Roundup (MON 2139)	2	2-2/3	20	174	97
				1	1-1/3	19	360	97
				1.5	2	19	360	91
MICHIGAN	3004	42-47	Roundup (MON 2139)	2	2-2/3	19	360	98
				0.5	2/3	20	156	73
				1	1-1/3	20	156	66
				1.5	2	20	156	86
				2	2-2/3	20	156	92

\* = 0