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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: PP#1F2518 Glyphosate on forage grasses. Amendment
of 3/8/82.

From: K.H. Arne, Ph.D., Chemist *KH Arne*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769) *CT*

To: Robert J. Taylor, PM No. 25
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our review of this petition we recommended against the proposed tolerance (see memo of 10/29/81, K. Arne). For a favorable recommendation we required the following.

1. The petitioner should submit a revised Section B in which the following revisions and/or additions are included.
 - a. A 7 day post-application grazing and feeding restriction should be imposed for the subject crops only. The more general 8 week grazing and feeding restriction should remain on the label.
 - b. Use should be proposed for pasture grasses and for those legumes for which use is intended.
 - c. A label restriction excluding this use from rangeland should be imposed.
 - d. A label restriction prohibiting application when livestock are present should be imposed.
 - e. The following label restriction should be imposed:
"Spot treatments should not exceed 1/10 of an acre in size. No more than 10% of any given acre should be treated."

2. The petitioner should propose tolerances for pasture grasses and for those legumes for which use is intended, all at 200 ppm. The tolerance should include their respective hays.
3. Tolerances of 0.5 ppm should be proposed for the liver and kidney of cattle, horses, sheep, hogs and goats.

With this amendment the following revision is proposed for page 51 of the label instructions.

SPOT TREATMENT

When used for spot treatments, this product controls annual and perennial weeds listed in this label which are growing in pasture, forage grass and forage legume production systems made up of bluegrass, brome, bahiagrass, ryegrass, bermudagrass, fescue, orchardgrass, timothy, wheatgrass, alfalfa, clover or any combination of these.

No more than one-tenth of any acre should be treated at one time. Wait 14 days to allow for decline of treated weeds before harvesting or permitting domestic animals to graze treated areas. Not for use in areas in which movement of domestic animals into treated areas cannot be controlled.

The above resolves deficiencies 1a, 1b and 1c. The petitioners statement "Not for use in areas in which movement of domestic animals into treated areas cannot be controlled" is preferable to the rangeland restriction that we had suggested.

Assuming that the general 8 week grazing and feeding restriction will remain on the label (p 44) we have no objection to the 14 day feeding and grazing restriction now proposed for forage grasses and legumes. The petitioner claims that the longer 14 day PHI (7 days were originally proposed) is needed because some weeds emit toxins as they senesce. A 14 day PHI would prevent exposure of livestock to these toxins. Because few data are available for a 14 day PHI the tolerance level is unaffected by this change.

Deficiency 1d has not been addressed and is therefore not resolved.

Deficiency 1e has been addressed by the addition of the phrase "No more than one-tenth of any acre should be treated at one time". Since the term "one time" is ambiguous as to how much time must pass before a second application is made we require the following addition: "Additional applications may be made in the same area at 30 day intervals". This deficiency is not resolved.

With this amendment the petitioner has also submitted a revised Section F in which the following proposals are made.

Bluegrass, brome, bahiagrass, ryegrass,
bermudagrass, fescue, orchardgrass,
timothy, wheatgrass, alfalfa, clover . . . 200.0 ppm

Cattle, horses, sheep swine, and goats -
Liver and kidney 0.5 ppm

This resolves deficiencies 2 and 3.

Recommendation

We recommend against the proposed tolerances. For a favorable recommendation, we require the following:

1. A label restriction prohibiting application when livestock are present should be imposed. We suggest that this be incorporated into the grazing and feeding restriction as follows: "Do not graze livestock in treated areas during application or for 14 days following".
2. The following label restriction should be imposed: "No more than one-tenth of any acre should be treated at one time. Additional applications may be made in the same area at 30 day intervals".

In responding to these deficiencies the petitioner should submit a current label in which all changes (additions and deletions) required by the proposed use on forage grasses and legumes are indicated.

TS-769:RCB:KArne:vg:CM#2:Rm810:X77324:5/3/82
cc: RF, Circ., Arne, Thompson, FDA, TOX, EEB, EFB, PP#1F2518
RDI: Quick, 4/26/82; Schmitt, 4/26/82