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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 25 1982

MEMORANDUM

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

TO: Robert Taylor
PM Herbicides
Registration Division (TS-767)

SUBJECT: Glyphosate (Round-up) Tolerances on or around
Aquatic Sites PP #9F2163, #9H5204, EPA
Reg. 524-308. Caswell No. 661-A.

I have attached a memo to me from Mr. Chitlik in which he offers two options regarding the registration of glyphosate as an aquatic herbicide.

With certain caveats, I recommend proceeding with option 1 with approval of glyphosate use on or around aquatic sites. I recommend such a registration be conditional upon receipt and favorable review of the mouse oncogenicity study on glyphosate.

Based on conversations and discussions with RCB chemist Bob Perfetti, (August 18, 1982) Tox Branch has learned that, although the level of detection of NNG (the nitroso-glyphosate) may be 2 ppb, the calculated worst case level for NNG at the time of spraying an acre of water one foot deep is three orders of magnitude less or approximately 2 ppt. This combined with the knowledge regarding the 1) low frequency of use per year per site 2) the fact that usually such application sites are deeper than one foot and 3) the photodegradation of NNG indicate that, even though the complete toxicological data base of NNG is clouded by the IBT incident, any hazard from NNG due to the aquatic use is almost non-existent.

It should be noted that the aquatic use proposal and our reviews and opinions be sent to EPA Office of Drinking Water.

William Burnam, Deputy Branch Chief
Toxicology Branch
Hazard Evaluation Division (TS-769)

cc: Dr. Teeters
Mr. Chitlik