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

AUG 10 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID#000524-00445. Glyphosate- Review of Minutes of 7/12/95 Meeting with Monsanto. MRID# none. Barcode D217778. Case 016787. CBTS# 15959.

FROM: G.F. Kramer, Ph.D., Chemist
Tolerance Petition Section III
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C) *[Signature]*

THRU: M.S. Metzger, Branch Chief
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C) *[Signature]*

TO: Robert Taylor, Product Manager
Terri Stowe, Team 25 Reviewer
Registration Division (7505C)

On July 12, 1995, G. Kramer and M. Metzger of CBTS met with representatives of Monsanto concerning the necessity for the 30-day plantback restriction currently required for glyphosate. Monsanto previously submitted a proposed label amendment for Roundup (glyphosate) to remove the crop rotation restriction which imposes a 30 day minimum plant-back interval for crops on which the use of glyphosate is not registered (Memo, G. Kramer 5/12/94). CBTS recommended against this amendment due to residues of glyphosate in excess of 0.01 ppm being detected in 30-day barley straw in the confined rotational crop study. During the course of the discussion, it was revealed that Monsanto thought that the 30 day plantback restriction allowed preemergent applications to crops for which use of Roundup is not registered as long as the application preceded planting by at least 30 days. They thus want the plantback restriction removed in order to allow such applications up to the time of planting. We explained that these applications are illegal as the first crop planted after application is considered to be the primary crop. Options for establishing preplant/preemergence uses on all crops were discussed. Monsanto proposed to add a paragraph to 40 CFR § 180.364 which would



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establish tolerances in all annual crops as a result of preplant/preemergence uses. CBTS replied that this approach appeared to be feasible and encouraged Monsanto to submit a formal petition for these tolerances.

The meeting minutes submitted by Monsanto accurately reflect the content of this meeting.

cc: Kramer, circ., R.F., S.F.
RDI: F.D. Griffith (8/3/95), M.J. Nelson for R.A. Loranger
(8/3/95), M.S. Metzger (8/8/95)
G.F. Kramer:804V:CM#2:(703)305-5079:7509C