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

JUN 6 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: **Pendimethalin Reregistration.** Registrant's Request for Clarification of Processing Data Requirements.

CBRS No.: 15149

DP Barcode No.: D212339

MRID No.: None

Chemical No.: 108501

Reregistration Case No.: 0187

FROM: Bonnie Cropp-Kohlligian, Environmental Scientist
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Bonnie Cropp-Kohlligian

THRU: William J. Hazel, Ph.D., Section Head
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W. J. Hazel

TO: Walter Waldrop/ Jane Mitchell [PM-71]
Reregistration Branch
Special Review and Reregistration Division [7508W]

In response to the Agency's requirement for additional processing studies for all oilseed crops (other than corn) on which pendimethalin is currently registered for use (memo by R. Loranger and R. Perfetti dated 1/29/91), American Cyanamid Corporation submitted a justification for why such studies should not be required and requested a meeting with Agency representatives to discuss the issue further (American Cyanamid Corporation letter dated 2/22/95). In the same submission the registrant also committed to conduct a pendimethalin rice processing study at an



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exaggerated application rate (unspecified) because they contend that rice culture is sufficiently different from that of other crops on which pendimethalin is registered for use to warrant such a study.

A meeting was held between representatives of American Cyanamid Corporation and the Agency on March 23, 1995 where the issue of additional pendimethalin processing studies was discussed and resolved (Memorandum of Conference by J. Stokes and B. Cropp-Kohlligian dated 4/7/95). At that meeting the Agency concluded, (i) that additional processing studies are not required to support the reregistration of pendimethalin on oilseed crops or the pending registration of pendimethalin on safflower (PP#3F2844), (ii) that food/feed additive tolerances for residues of pendimethalin in the processed commodities of pendimethalin treated oilseed crops (including safflower) are not required, and (iii) that rice processing data are required for the purposes of reregistration and that these data could be translated to support the pending registration of pendimethalin on wheat/barley (PP#3F2788).

cc: BLCKohlligian (CBRS), RF, Pendimethalin Reg. Std. File, Pendimethalin SF, Circulate.

RDI: WJHazel:5/30/95 MMetzger:5/31/95 EZager:6/1/95

7509C:CBRS:BLCKohlligian:CM#2:Rm 805B:703-305-7462:5/22/95.