September 11, 1991

BASF CORPORATION
Agricultural Products Group
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Company No. 7969

Case Name: Sodium Acifluorfen
Case No. : 2605
Chem. No.: 114402

WAIVER REQUEST

Guideline No. 171-4(1): Magnitude of the Residue in Processed Fractions - Soybeans

In its Phase 3 Response, BASF submitted a waiver request for a processed fraction study in soybeans based on the fact that even when soybeans were treated at exaggerated rates, no residues were found in the Raw Agricultural Commodity. The Agency denied that Waiver Request in its Phase 4 response.

Since that Waiver Request was submitted, BASF has petitioned the Agency to lower the maximum allowable use rate on soybeans to 0.5 lb. ai/acre/season. That revised labeling was approved by EPA on September 2, 1991.

Data have been presented to the Agency (see attached Table from MRID No. 92168053) which show that at a 2x current application rate (at or below the current PHI) no detectible residues of sodium acifluorfen (limit of detection of 0.01 ppm) can be found in the seed.

It must be noted here that sodium acifluorfen is a herbicide with a relatively low crop tolerance in soybeans. At a PHI of 50 days, field experience has shown that soybeans do not survive treatment with a total of more than 1.5 lbs. ai/acre/season, even when the product is applied in multiple applications. The data cited in MRID No. 92168053 (attached) include an application of 1.3 lbs. ai/acre, which is close to the maximum rate which can be applied at a PHI of 50 days without death of the crop. No detectible residues were seen in the seed when that rate was applied.

Since it is highly unlikely that a higher rate could be applied to a crop that would survive to produce seed, BASF requests a waiver from this requirement.

RIN 7330-94

SODIUM ACIFLUROFEN REVIEW

Page 2 is not included in this copy.

Pages _____ through _____ are not included.

The material not included contains the following type of information:

____ Identity of product inert ingredients.

____ Identity of product impurities.

____ Description of the product manufacturing process.

____ Description of quality control procedures.

____ Identity of the source of product ingredients.

____ Sales or other commercial/financial information.

____ A draft product label.

____ The product confidential statement of formula.

____ Information about a pending registration action.

✓ FIFRA registration data.

____ The document is a duplicate of page(s) _____.

____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
