MEMORANDUM

SUBJECT: Transmittal Memoranda to Accompany EFED’s Review of Penoxsulam Non-Guideline Composting Studies

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Two composting studies (MRID's 46930301 and 46930302) using penoxsulam have been reviewed by EFED. Data evaluation reports for the two composting studies have been completed, and accompany this transmittal memo. Both studies are non-guideline, and are therefore classified as supplemental towards fulfilling the data requirements for penoxsulam.

Penoxsulam had a first order, foliar dissipation half-life of 13 to 14 days in Kentucky bluegrass (MRID 46930301), and a first order, foliar dissipation half-life of 2.3 days in colonial bentgrass, creeping bentgrass and fine leaf fescue (MRID 46930302). The main route of dissipation in turf appears to be associated with foliar wash-off.

The Kentucky bluegrass grass clippings were mixed with dried leaves, mostly oak, and composted for 160 days. The colonial bentgrass, creeping bentgrass and fine leaf fescue grass clippings were mixed with dried leaves and composted for 125 days. Potting mixture with as little as 10% of the compost derived the test plots produced an adverse phytotoxic affect in the form of reduces plant weight to sugar beets, the most sensitive species tested. A precautionary label should be considered when grass clippings from areas treated with penoxsulam are use as compost starting material.