To: Robert Taylor  
Product Manager 25  
Registration Division (TS-767)  

From: Samuel Creeger, Chief  
Review Section #1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769)  

Attached, please find the EAB review of...

Reg./File #: 352-EUP-111  
Chemical Name: Metsulfuron Methyl  
Type Product: Herbicide  
Product Name: ALLY  
Company Name: DuPont  
Purpose: Response to review of 7/12/84: accumulation in fish  

Action Code(s): 705  
EAB #(s): 5383  
Date Received: 2/12/85  
TAIS Code: 52  
Date Completed: 6/4/85  
Total Reviewing Time: 1.0 days  

Deferrals to:  
Ecological Effects Branch  
Residue Chemistry Branch  
Toxicology Branch
1. **CHEMICAL:**

Metsulfuron Methyl, DPX T6376  
Methyl 2-[[[[4-methoxy-6-methyltriazin-2-yl]-amino]carbonyl]-amino]sulfonyl]benzoate

2. **TEST MATERIAL:**

Analytical grade, phenyl-labeled metsulfuron methyl

3. **STUDY/ACTION TYPE:**

Accumulation in Fish. Response to review of 7/12/84. Data to support proposed EUP use on Cereals.

4. **STUDY IDENTIFICATION:**


5. **REVIEWED BY:**

Emil Regelman  
Chemist  
EAB/HED/OPP  
Signature:  
Date: 6/4/85

6. **APPROVED BY:**

Samuel Creeger  
Chief  
Review Section #1, EAB/HED/OPP  
Signature:  
Date: JUN 05 1985

7. **CONCLUSIONS:**

The deficiencies noted in the review of 7/12/84 have been resolved. This study, as amended, is acceptable in support of the accumulation in fish data requirement.
8. **RECOMMENDATIONS:**

The following data requirements have been satisfied for purposes of the proposed EUP use on Cereals: Hydrolysis, Aerobic Soil Metabolism and Accumulation in Fish. The Confined Accumulation in Rotational Crops and Leaching data requirements have still not been satisfactorily addressed.

9. **BACKGROUND:**

   **A. Introduction**

   On 7/12/84, FAB completed its review of the initial draft of study noted in §4, above. At that time, the study was found to be scientifically valid. Metsulfuron methyl did not appear to have any propensity to bioaccumulate in the bluegill sunfish tested.

   FAB raised a number of questions relative to that study which the current submission addresses.

   **B. Directions for Use**

   See review of 5/20/83.

10. **DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:**

   **A. Study Identification**


   **B. Issues raised in FAB review of 7/12/84, and Registrant's responses thereto**

   **10.A.1 EAB Comment:** Method used to dose aquaria was not specified.

   **DuPont Response:** The initial dosing of the two test tanks resulted in establishment of the desired level of test material (1.0 and 0.01 ppm). Monitoring throughout the 28 day uptake phase confirmed that levels remained nominal. No degradation products were detected in any water sample taken.
10.A.2  EAR Comment : Sample TLC chromatograms were not submitted.
DuPont Response: Due to the extremely low uptake, no TLC quantification was done.

10.A.3  EAR Comment : Raw counting data were not submitted.
DuPont Response: Counting data were included with this submission.

10.A.4  EAR Comment : It was not reported whether any fish died.
DuPont Response: No fish died throughout the experimental period.

C. Reported Results
D. Study Author's Conclusions/Quality Assurance Measures
E. Reviewer's Discussion and Interpretation of Study Results
All outstanding issues relative to the cited study have been satisfactorily addressed by the registrant.

11. COMPLETION OF ONE-LINER:
No additional data have been added to the ongoing one-line data summaries.

12. CBI APPENDIX:
There is no CBI appendix.