

US EPA ARCHIVE DOCUMENT

D171713
DPBARCODE (RECORD)
122010
SHAUGHNESSY NO

11
REVIEW NO.

EEB REVIEW

DATE IN: 12-3-91 OUT: 9-21-92
ASSIGNED: 12-6-91
CASE # : 016737 REREG CASE #: _____
SUB. # : S407569 LIST A, B, C, D
ID # : 352-435

DATE OF SUBMISSION 11-20-91
DATE RECEIVED BY EFED 12-3-91
SRRD/RD REQUESTED COMPLETION DATE 3-26-92
EEB ESTIMATED COMPLETION DATE 3-26-92
SRRD/RD ACTION CODE/TYPE OF REVIEW 330 NEW USE
MRID #(S) _____

DP TYPE 001
PRODUCT MANAGER, NO. ROBERT TAYLOR 25 VICKIE WALTERS
PRODUCT NAME(S) ALLY, METSULFURON METHYL
TYPE PRODUCT HARVEST AID
COMPANY NAME DUPONT
SUBMISSION PURPOSE REVIEW NEW USE: ALLY HARVEST AID FOR
USE ON WHEAT AND BARLEY, CONSIDER RISKS
TO NONTARGET, IDENTIFY DATA REQUIREMENTS
COMMON CHEMICAL NAME ALLY

REVIEWER: RICK PETRIE

DP BARCODE: D171713

CASE: 016737
SUBMISSION: S407569

DATA PACKAGE RECORD
BEAN SHEET

DATE: 11/27/91
Page 1 of 1

*** CASE/SUBMISSION INFORMATION ***

CASE TYPE: REGISTRATION ACTION: 330 TECH-NEW F/F USE AMND
CHEMICALS: 122010 Methyl 2----- (4-methoxy-6-methyl-1,3,5-triazin-2-yl) amino= 60.0000%

ID#: 000352-00435 DUPONT ALLY HERBICIDE
COMPANY: 000352 E. I. DU PONT DENEMOURS AND COMPANY, INC.
PRODUCT MANAGER: 25 ROBERT TAYLOR 703-305-6800 ROOM: CM2 241
PM TEAM REVIEWER: VICKIE WALTERS 703-305-5704 ROOM: CM2 253
RECEIVED DATE: 11/20/91 DUE OUT DATE: 05/28/92

*** DATA PACKAGE INFORMATION ***

DP BARCODE: 171713 EXPEDITE: N DATE SENT: 11/27/91 DATE RET.: / /
CHEMICAL: 122010 Methyl 2----- (4-methoxy-6-methyl-1,3,5-triazin-2-yl) amino=
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 03/26/92 CSF: N LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	12/10/91	/ /
BRAN: EEB	12/10/91	/ /
SECT: IO	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

*** DATA REVIEW INSTRUCTIONS ***

New use for Ally as a harvest aid. Label and data references included.

*** ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION ***

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
171709	TSCB/IO	11/27/91	03/26/92	Y	N	Y
171710	TB-1/IO	11/27/91	03/26/92	Y	N	Y
171711	EFGB/IO	11/27/91	03/26/92	Y	N	Y

2

DP BARCODE: D171713

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SUBMISSION: S407569

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DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 03/26/92 CSF: N LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	12/03/91	/ /
BRAN: EEB	/ /	/ /
SECT: IO	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

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Page 1 of 1

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ECOLOGICAL EFFECTS BRANCH REVIEW

Chemical: Ally (metsulfuron methyl)

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

DuPont Chemical Co. is requesting the addition of a late season postemergent application of Ally to their existing Section 3 Ally label (Registration Number: 352-435). DuPont is requesting aerial or ground application of Ally in a tank mix with 2,4-D; for use in the states of CO, KS, MT, ND, NE, NM, OK, TX, AND WY. Ally will be applied just prior to harvest (harvest aid treatment) to kill weeds that inhibit the combine or contaminate the harvested grain.

100.2 Formulation Information

Escort/Ally

ACTIVE INGREDIENTS:-----60.0%
Methyl 2-[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)-amino] carbonyl]-sulfonyl] benzoate
INERT INGREDIENTS:-----40.0%

100.3 Application Methods, Directions, Rates

A proposed supplemental label was provided. Ally will be applied in a tank mix with an amine or low volatile ester formulation of 2,4-D, plus 1 to 2 quarts of a surfactant /100 gallons of spray solution in all of the above listed states except where 2,4-D restrictions are in effect in the states of OK and TX. In these areas, Ally plus surfactant will be used. In all areas, the rate of application is 1/10 oz. Ally per acre (0.004#ai/A). Ally will be applied after the crop is in the dough stage but no later than 10 days prior to harvest. The proposed Ally harvest aid label allows a maximum of 1/10 oz./A in a 10 month period.

Ally is currently registered for ground or aerial application in wheat or barley when the crop is in the 2-leaf stage but before the boot stage (winter or spring wheat types). The current Ally label states that the maximum use rate is 1/10 oz/A in a 22 month period in CO, ID, W-KS, W-NE (west of highway 183), MN, NM, ND, OK Panhandle, TX Panhandle, SD, UT, WA, and WY. The maximum use rate is 1/10 oz./A in a 10 month period in Central KS, Central NE, Central OK, and N. Central TX. Depending on soil pH, the rotational crop restrictions

range from 1 month for winter/spring wheat to 34 months in specific soybean, grain sorghum/millet, field corn, alfalfa, dry bean, flax, safflower, and sunflower growing areas.

100.4 Target Organisms

The target weeds will be quite tall at the time of treatment. The Ally rate does not vary with weed height or density as does the 2,4-D rate. Target weeds include: common cocklebur, common purslane, kochia*, lambsquarters, marestail, pigweeds, prickly lettuce*, plains coreopsis, puncturevine, Russian thistle*, and sunflower. Weeds with astrisks may be resistant to Ally.

100.5 Precautionary Labeling

A supplemental label was provided and is attached.

101 Hazard Assessment

101.2 Likelihood of Adverse Effects on Nontarget Organisms

Terrestrial Organisms

Metsulfuron methyl has been characterized by Environmental Fate and Ground Water Branch (EFGWB) in a review dated June 22, 1990 as "mobile, particularly in soils with high-sand content/low organic matter content; it is also somewhat persistent in soils and has been determined to be a potential leacher." The chemical is stable to hydrolysis at pH 7 and 9 and has a T1/2 of 3 weeks at pH 5 (25 C). For a complete list of available EFGWB data see attached One Line Summary.

Data from previous reviews indicate that metsulfuron methyl is practically nontoxic to birds on both an acute oral basis and a dietary basis (mallard duck LD50 >2510 mg/kg, LC50 >5620 ppm, bobwhite quail LC50 >5620 ppm). The available data on rats suggest that the chemical also has a low mammalian toxicity (LD50 >5000 mg/kg - male and female). The dermal LD50 for the rabbit was reported to be >2000 mg/kg. A 90-day dietary test using the rat showed a NOEL of 1000 ppm.

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Using the maximum application rate of 0.1 oz/A (0.004 #ai/A), the following residues were calculated using the nomograph of Kenaga and Hoerger (1972):

<u>Substrate</u>	<u>Residue (ppm)</u>
Short range grass	0.96
Long grass	0.44
Leaves and leafy crops	0.50
Forage	0.23
Pod containing seeds	0.05
Fruit	0.03
Small insects	0.23
Large insects	0.05

These levels are all well below calculated or laboratory determined toxicity values for both mammals and birds. Based on the data currently available, the hazard to birds and mammals from the use of Ally for weed control in wheat or barley is considered minimal.

With an acute contact LD50 value of >25 ug/bee, metsulfuron methyl is not expected to adversely affect honey bees at the maximum recommended application rate.

Aquatic Organisms

Metsulfuron methyl is practically nontoxic to freshwater fish and aquatic invertebrates (LC50's >150 ppm for rainbow trout, bluegill sunfish, and Daphnia magna). Assuming an inadvertent direct application to a pond 6 feet deep, the estimated environmental concentration (EEC) could be 0.24 ppb. In a pond 6 inches deep the concentration could be 2.94 ppb. These values are considerably less than the lowest aquatic LC50 and do not exceed the 1/10 LC50 trigger for restricted use classification. On the basis of these figures, the proposed use of Ally/Escort will not result in an increased hazard to aquatic organisms.

Nontarget Plants

The potential exists for herbicides to move from the site of application through drift, volatilization, and runoff. The Ally Section 3 label (352-435) and this supplemental label have extensive precautions against spray drift. The proposed label states "Do not allow spray to drift onto adjacent crops, or onto agricultural land scheduled to be planted to crops other than wheat, as injury to the crop may occur. Extreme

care must be taken to prevent drift onto susceptible nontarget plants or nontarget land". Metsulfuron methyl has been characterized as nonvolatile (vapor pressure 2.5×10^{-12} mm Hg @ 25C) but soluble in water (9,500 ppm @ Ph 6.7, 25C).

EEB's primary concern is from drift during aerial application and runoff following aerial or ground application.

Runoff/Drift - Aquatic Plants

Based on a previous review, the 5-day EC50 value for Selenastrum capricornutum is 285.6 ppb. Assuming an aerial application of 0.004 lb ai/a with 5% drift, 0.0002 lb ai could drift into an adjacent one acre pond. In addition, runoff would add 0.0012 lb ai resulting in a pond loading of 0.0014 lb ai; or a water concentration of 0.09 ppb in 6 feet of water and 1.0 ppb in 6 inches of water.

RUNOFF = 0.004 lb ai/a x 0.6 application efficiency x 5% runoff x 10 acres = 0.0012 lb ai. DRIFT = 0.004 lb ai/a x 5% drift = 0.0002 lb ai. RUNOFF + DRIFT = 0.0014 lb ai off target.

6 FOOT DEEP WATER = 0.0014 lb ai x 61 ppb = 0.09 ppb

6 INCH DEEP WATER = 0.0014 lb ai x 734 = 1.0 ppb

Based on a previous review, the 14-day EC50 value for Lemna minor is 0.36 ppb. Assuming an aerial application of 0.004 lb ai/a with 5% drift, 0.0002 lb ai could drift into an adjacent one acre pond. In addition, runoff would add 0.00012 lb ai resulting in a total pond loading of 0.0003 lb ai; or a water concentration of 0.018 ppb in a 6 foot deep water body and 0.220 ppb in a 6 inch water body. Nontarget macrophytes are not expected to be adversely affected from the proposed uses of Ally at 0.004 lb ai/a.

RUNOFF = 0.004 lb ai/a x 0.6 application efficiency x 5% runoff x 1 acre = 0.00012 lb ai. DRIFT = 0.004 lb ai/a x 5% drift = 0.0002 lb ai. RUNOFF + DRIFT = 0.0003 lb ai. off target.

6 FOOT WATER BODY = 0.0003 lb ai x 61 = 0.018 ppb

6 INCH WATER BODY = 0.0003 lb ai x 734 = 0.220 ppb

Runoff - Aquatic Plants

Selenastrum capricornutum

Assuming a ground application of 0.004 lb ai/a with 5% runoff

x 10 acres, 0.002 lb ai could runoff into an adjacent pond. This could result in a water concentration of 0.122 ppb in 6 feet of water and 1.468 ppb in 6 inches of water. Ground application of 0.004 lb ai/a is not expected to adversely affect alga species.

Lemna minor

Assuming a ground application of 0.004 lb ai/a with a 5% runoff x 1 acre, 0.0002 lb ai could runoff into an adjacent area. This would result in a water concentration of 0.0122 ppb in 6 feet of water and 0.1468 in 6 inches of water. Ground application of 0.004 lb ai/a is not expected to adversely affect aquatic macrophytes.

Runoff/Drift - Terrestrial Plants (Preemergence)

Drift during application of 0.004 lb ai/A (0.74 grams ai/ha) with subsequent runoff could result in 0.0003 lb ai (0.055 gms ai) being deposited on a one hectare site adjacent to a treated field. This value exceeds the preemergence EC25 values for morningglory and sugarbeet (0.01 and 0.05 gms ai/ha, respectively). Consequently, based on currently available data, the germination/emergence of nontarget terrestrial plants could be adversely affected following an aerial application of Ally Herbicide.

Drift - Terrestrial Plants (Postemergence)

Postemergence Tier II terrestrial plant phytotoxicity data for metsulfuron methyl provides an EC25 values for soybean of 0.02 gms ai/ha. Assuming 5% drift, 0.04 gms ai could be deposited on a one hectare site adjacent to the treated field; which would exceed the EC25 value for this species. Consequently, based on currently available data, the vegetative vigor of nontarget terrestrial plants could be adversely affected following an aerial application of Ally using 0.004 lb ai/a.

Runoff - Terrestrial Plants (Preemergence)

Runoff following a ground application of 0.004 lb ai/A (0.736 gm ai/ha) could result in 0.04 gms ai being deposited on an adjacent one hectare site. This value exceeds the preemergence EC25 value for morningglory (0.01 gms ai/ha). Consequently, based on currently available data, the germination/emergence of nontarget terrestrial plants could be adversely affected following a ground application of Ally.

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101.3 Endangered Species Considerations

Based on the very low application rate and practically nontoxic characterization of the metsulfuron methyl, endangered/threatened mammals, fish, and birds are not expected to be adversely affected from the harvest aid use of Ally for weed control in wheat and barley. However, endangered and threatened plants have been identified as occurring in regions where the herbicide could be used. Application of this herbicide by ground or air is expected to adversely affect species growing in close proximity to the site of application. Consequently, EEB will request a formal consultation with the U.S. Fish and Wildlife Service, Office of Endangered Species.

101.4 Adequacy of Toxicity Data

No new data were submitted with this submission.

101.5 Adequacy of Labeling

A supplemental label for the proposed harvest aid use was submitted, and is attached. The supplemental label does not have an ENVIRONMENTAL HAZARDS section as does the 352-435 label. All environmental hazards must be listed on the supplemental label.

103 Conclusions

Mammals, birds, aquatic organisms, and honey bees are not expected to be adversely affected by this new use. However, the potential exists for nontarget terrestrial plants to be adversely affected from drift and runoff. Due to the high potential for off-target injury to plants (foliar injury >25% to soybeans at 0.02 grams ai/ha) other EEB concerns include potential for non-target plant injury from wind-blown soil because of the long half life of Ally in certain soils and injury to crop plants irrigated with Ally contaminated groundwater, should this occur.

Endangered/threatened species, other than plants, are not expected to be impacted. The potential exists for endangered/threatened terrestrial plants to be adversely affected from the proposed harvest aid uses in wheat and barley. Because Ally is already registered for aerial use in wheat and barley, the EEB will request that Ally be part of a general herbicide consultation with the U.S. Fish and Wildlife Service, Office of Endangered Species at some point in the future. EPA and the registrants must encourage growers to become cognizant of the potential for off-target movement

to endangered/threatened plants and to obtain endangered species brochures as they become available.

Outstanding studies include:

- 1.) 124-1 Non-target Terrestrial Plant Phytotoxicity Study. The requirement to perform this study is on-hold until after the agency has published a technical guidance document describing how to perform this test.
- 2.) 201-1, 202-1 drift studies. These studies are to be submitted to EFGWB/EFED/OPP.

Richard C. Petrie 9/17/92

Richard C. Petrie
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

Daniel D. Rieder

Daniel D. Rieder, Head Section 3
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

Douglas J. Urban 9/31/92

Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

ALLY (WHEAT + BARLEY HARVEST AID)

9/15/92

Attachment A

EEC CALCULATION SHEET

I. For un-incorporated ground application

A. Runoff

16
A 7

$$0.004 \text{ lb(s)} \times 0.05 \times 10 \text{ (A)} = 0.002 \text{ lb(s)}$$

(1% runoff) (from 10 A. drainage basin) (tot.runoff)

EEC of 1 lb a.i. direct application to 1 A. pond 6-foot deep = 61 ppb

$$\text{Therefore, EEC} = 61 \text{ ppb} \times \frac{0.002}{734 \text{ ppb}} = 0.122 \text{ ppb}$$

$$734 \text{ ppb} \times 0.002 = 1.47 \text{ ppb}$$

II. For incorporated ground application

A. Runoff

$$\text{___ lb(s)} \div \text{___ (cm)} \times 0.0 \times 10 \text{ (A)} = \text{___ lb(s)}$$

(depth of incorporation) (% runoff) (10 A. d.basin) (tot.runoff)

$$\text{Therefore, EEC} = 61 \text{ ppb} \times \text{___ (lbs)} = \text{___ ppb}$$

III. For aerial application (or mist blower)

A. Runoff

$$0.004 \text{ lb(s)} \times 0.6 \times 5\% \times 10 \text{ (A)} = 0.0012 \text{ lb(s)}$$

(appl. efficiency) (1% runoff) (10 A. d.basin) (tot.runoff)

B. Drift

$$0.004 \text{ lb(s)} \times 0.05 = 0.0002 \text{ lb(s)}$$

(5% drift) (tot. drift)

$$\text{Tot. loading} = 0.0012 \text{ lb(s)} + 0.0002 \text{ lb(s)} = 0.0014 \text{ lb(s)}$$

(tot. runoff) (tot. drift)

$$\text{Therefore, EEC} = 61 \text{ ppb} \times 0.0014 \text{ (lbs)} = 0.085 \text{ ppb}$$

$$734 \text{ ppb} \times 0.0014 = 1.03 \text{ ppb}$$

ALLY (WHEAT + BARLEY HARVEST AID) 9/15/92

EEC CALCULATION SHEET FOR TERRESTRIAL PLANTS
AND AQUATIC MACROPHYTES

1.) Unincorporated Ground Application (use seed germination/
seedling emergence test results):

RUNOFF: $\frac{0.004}{\text{#ai/A}} \times 5\% \text{ runoff} \times 1 \text{ acre} = \underline{0.0002} \text{ #ai}$ $61 = 0.012288$
 $734 = 0.146888$

2.) Incorporated Ground Application (use seed germination/
seedling emergence test results):

RUNOFF: $\frac{\text{#ai/A}}{\frac{2}{\text{cm}} \text{ depth of incorp.}} \times \% \text{ runoff} \times 1 \text{ acre} = \text{#ai}$

3.) Aerial Application, Mist Blower and Sprinkler Irrigation (use seed germination/
seedling emergence test results):

A.) RUNOFF: (from site after application) $\frac{0.004 \text{ #ai/A} \times 0.6 \text{ appl. efficiency} \times 5\% \text{ runoff} \times 1 \text{ acre}}{\text{#ai}} = \underline{0.00012} \text{ #ai}$

B.) DRIFT: (from site during application) $\frac{0.004 \text{ #ai/A} \times 5\% \text{ (drift)}}{\text{#ai}} = \underline{0.0002} \text{ #ai}$

TOTAL = $\underline{0.0003} \text{ #ai}$

4.) Aerial Drift Calculation (use vegetative vigor test results):

DRIFT: $\frac{0.004 \text{ #ai/acre} \times 5\% \text{ (drift)}}{\text{#ai}} = \underline{0.0002} \text{ #ai}$

EC25 plant phytotoxicity values are used for terrestrial non-target and endangered/threatened plants.

EC50 terrestrial plant phytotoxicity values are used for aquatic macrophytes and endangered/threatened aquatic macrophytes.

% runoff value can be 1%, 2%, or 5% depending on the water solubility of the pesticide.

METSULFURON-METHYL

Page _____ is not included in this copy.

Pages 14 through 16 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.

(A) 	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460 Application for Pesticide:	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number 159218
	Section I		

1. Company/Product Number 352-435	2. EPA Product Manager R. J. Taylor	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Du Pont "Ally" Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) E. I. Du Pont de Nemours & Company Agricultural Products Barley Mill Plaza, Walker's Mill 6-170 Wilmington, DE 19880-0038 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section II	
<input checked="" type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 This package is submitted in support of a petition for tolerances for residues of metsulfuron methyl ("Ally" Herbicide) in wheat (grain and straw) and barley (grain and straw).

Section III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," Unit Package wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container 8 oz.	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner In Which Label Is Affixed To Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other (_____)	

Section IV		
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James W. Denny	Title Registration Specialist	Telephone No. (Include Area Code) (302) 992-6189

Certification		6. Date Application Received (Stamped) <div style="text-align: right; font-size: 1.5em;">17</div>
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title Registration Specialist	
4. Typed Name James W. Denny	5. Date 7/17/91	

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDE PROGRAMS (WH-567) WASHINGTON, D.C. 20460		1. COMPANY/REGISTRATION NO. 352-435	2. EPA USE ONLY ---
LABEL TECHNICAL DATA (See INSTRUCTIONS on back of last part)			
3. PRODUCT NAME F Du Pont "Ally" Herbicide			
4. APPLICATION SITES (Check all that apply)		5. PEST TYPE (Check all that apply)	
01 CROPS (Fruit)		01 ALGAE	
02 CROPS (Vegetable)		02 AMPHIBIAN/REPTILE	
<input checked="" type="checkbox"/> 03 CROPS (Field)		03 BACTERIA	
04 CROPS (Spice)		04 BIRDS	
05 CROPS (Nut)		05 FISH	
06 CROPS (Other)		06 FOULING ORGANISMS	
10 SOIL TREATMENT (No crop specified)		07 FUNGI	
20 FOREST		08 INSECTS AND MITES	
30 ORNAMENTALS		09 MAMMALS	
40 TURF		10 NEMATODES	
50 STORED PRODUCTS TREATMENT		<input checked="" type="checkbox"/> 11 PLANTS	
61 ANIMALS (Livestock)		12 RODENTS	
62 ANIMALS (Dairy)		13 SLIME	
63 ANIMALS (Pet)		14 SLUGS AND SNAILS	
64 ANIMALS (Laboratory)		15 VIRUS	
69 ANIMALS (Other)		16 OTHER (Specify)	
71 OUTDOOR (Nocrop Agricultural)		6. MODE OF ACTION (Check all that apply)	
72 OUTDOOR (Resident/Commercial)			
73 OUTDOOR (Non agricultural)			
81 BUILDINGS (Agricultural)			
82 BUILDINGS (Commercial)		<input checked="" type="checkbox"/> 01 ATTRACTANT	
83 BUILDINGS (Food Processing)		02 BIOLOGICAL CONTROL	
84 BUILDINGS (Medical)		03 CHEMOSTERILANT	
85 BUILDINGS (Residential)		04 DEFOLIANT	
91 EQUIPMENT (Commercial)		05 DESICCANT	
92 EQUIPMENT (Food)		06 FEEDING DEPRESSANT	
93 EQUIPMENT (Agricultural)		07 GROWTH INHIBITOR	
94 EQUIPMENT (Medical)		08 GROWTH REGULATOR	
95 EQUIPMENT (Transportation)		09 POISON (Single dose)	
96 LAUNDRY AND DRY CLEANING		<input checked="" type="checkbox"/> 10 POISON (Multiple Dose)	
97 INDUSTRIAL PRESERVATIVES		11 PRESERVATIVE	
98 PESTICIDE (Manufacturing only)		12 REFELLENT	
99 OTHER (Specify)		13 OTHER (Specify)	
7. USER TYPE (Check all that apply)			
<input checked="" type="checkbox"/> 01 UNSPECIFIED GENERAL USE			
02 UNSPECIFIED RESTRICTED USE			
03 HOMEOWNER USE			
04 JANITORIAL USE			
05 PEST CONTROL OPERATOR USE			
06 COMMERCIAL APPLICATOR USE			
<input checked="" type="checkbox"/> 07 FARMER USE			
08 MEDICAL USE			
09 VETERINARY USE			
10 GOVERNMENT AGENCY USE			
11 MANUFACTURING USE			
8. FORMULATION (Check one only)			
01 TECHNICAL CHEMICAL			
02 FORMULATION INTERMEDIATE			
03 DUST			
<input checked="" type="checkbox"/> 04 GRANULAR			
05 PELLETTED/TABLETTED			
06 WETTABLE POWDER			
07 WETTABLE POWDER/DUST			
08 CRYSTALLINE			
09 MICROENCAPSULATED			
10 IMPREGNATED MATERIALS			
11 SELF-GENERATING SMOKE			
12 EMULSIFIABLE CONCENTRATE			
13 INVERT EMULSION			
14 FLOWABLE CONCENTRATE			
15 SOLUBLE CONCENTRATE			
16 SOLUTION (Ready to Use)			
17 OILS (No added pesticide)			
18 PRESSURIZED (Gas)			
19 PRESSURIZED (Liquid)			
20 PRESSURIZED (Dust)			
21 OTHER (Specify)			
REMARKS			

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AGRICULTURAL PRODUCTS
 Walker's Mill, Barley Mill Plaza
 P.O. Box 80038
 Wilmington, DE 19880-0038
 Registration & Regulatory Affairs
 Fax: 302-992-6470

July 17, 1991

Mr. Robert J. Taylor, PM-25
 Office of Pesticide Programs
 Registration Division (H-7505C)
 Document Processing Desk
 U.S. Environmental Protection Agency
 Crystal Mall 2
 1921 Jefferson Davis Highway
 Arlington, VA 22202

Subject: Du Pont "Ally" Herbicide
 Application for Pesticide Amendment

Submission of Data to Support the Pesticide Petition
 for Tolerances of Metsulfuron Methyl (Du Pont "Ally"
 Herbicide) on Wheat and Barley

Dear Mr. Taylor:

We, the undersigned, E. I. Du Pont de Nemours and Company, hereby
 apply for amended registration of "Ally" Herbicide and we hereby petition for
 tolerances of metsulfuron methyl ("Ally" Herbicide) on wheat and barley as
 follows:

<u>COMMODITY</u>	<u>PPM</u>
Wheat, Grain	0.1
Wheat, Straw	0.3
Barley, Grain	0.1
Barley, Straw	0.3

In support of this petition for tolerances, we respectfully submit the following:

- 1). Transmittal Document
- 2). EPA Form 8570-1 (OPP. ID No. 158588) "Application for Pesticide
 Amendment" for Du Pont "Ally" Herbicide

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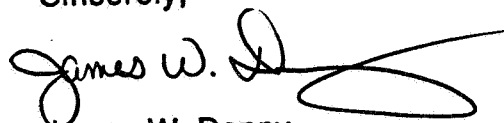
- 3). EPA Form 8570-29 "Certification with Respect to Citation of Data" for Du Pont "Ally" Herbicide
- 4). EPA Form 8570-10 "Label Technical Data" for Du Pont "Ally" Herbicide
- 5). In accordance with PR Notice 86-1 on fees for tolerance petitions, a certified check in the sum of \$14,375 has been sent to:

U.S. Environmental Protection Agency
Headquarters Accounting Operations Branch
Office of Pesticide Programs (Tolerance Fees)
P.O. Box 360277M
Pittsburgh, PA 15251

- 6). Five (5) unbound copies of the proposed label for Du Pont "Ally" Herbicide
- 7). Three (3) copies of the pesticide tolerance petition for metsulfuron methyl ("Ally" Herbicide)
- 8). Three (3) copies each of the 9 studies supporting the application for pesticide amendment and the pesticide tolerance petition

Please let me know if you have any questions. I can be reached on (302) 992-6189. Thank you!

Sincerely,



James W. Denny
U.S. Registration Specialist

JWD:can-0717.01
Attachment

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