

US EPA ARCHIVE DOCUMENT



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

File - 125401

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

June 13, 1986

Subject: Command Meeting on Off-target Movement and Carry-over problems.

From: James Yowell, Team 25 RD

To: Bill Burnam	TOX/HED	Anne Barton	HED
Dave Severn	EAB/HED	Tom Ellwanger	FHB/RD
Bob Holst	EAB/HED	Carl Grable	FHB/RD
Sam Creeger	EAB/HED	James Akerman	RD
Mike Slimak	EEB/HED	Lynn Bradley	RCB/HED
Chuck Trichilo	RCB/HED	Rick Loranger	RCB/HED
Tom Adamczyk	FHB/RD	Frank Sanders	FHB/RD
Bob Taylor	FHB/RD		

The meeting is scheduled for June 18, 1986 in room 1112C at 9:30 AM. FMC has provided an agenda and list of attendees. Please attend or send a representative. If you have any questions about the meeting or the problem call Frank Sanders or Tom Adamczyk on 557-1650.



June 13, 1986

Mr. James Akerman
Deputy Director, Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division (TS-767-C)
Crystal Mall, Building #2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Akerman:

Subject: Command 6 EC Herbicide
EPA Reg. No. 279-3054
Command 4 EC Herbicide
EPA Reg. No. 279-3053
Command Technical
EPA Reg. No. 279-3052

As we discussed on June 12, 1986, FMC Corporation is actively pursuing an explanation for the reported incidents of carryover and "off-target" movement (chlorosis of non-target plants) by Command Herbicide.

In order that we may minimize this effect in the future we would like to discuss criteria for acceptable label modifications regarding application recommendations. Additionally, we would like to discuss the question of potential inadvertent residues and data that may be required to address this issue. The following are some points for discussion:

- o 1986 FMC research programs
- o random residue samples from reported "off-target" incidents
- o precedents with other herbicides
- o direct spraying of crops and residue sample harvest intervals when simulating "off-target" movement
- o rates to be used

694

- o crops to be tested and feasibility of a crop grouping approach
- o representative geographical locations
- o entities to be analyzed (i.e. metabolites, parent compound)
- o choice of crop(s) for a foliar plant metabolism study
- o animal forage/feed crop related issues
- o meat, milk, poultry, eggs residue related questions
- o processed commodities

FMC is considering alternative formulations to our current Command 4 EC and Command 6 EC. While we are aware of the standard requirements, e.g. acute toxicology and product chemistry, we need to discuss whether the Agency will require additional data.

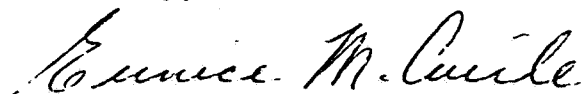
We will also be prepared to discuss the concerns presented in your letter dated June 12, 1986.

We appreciate the opportunity to meet with representatives from the EPA to discuss these issues on Wednesday, June 18, 1986.

In attendance from FMC will be:

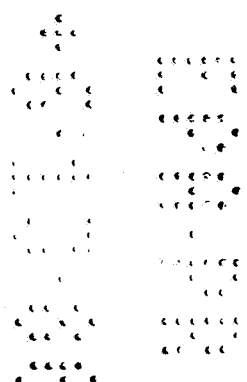
Ed Cherry (Director, Product Registrations and Planning)
Ron Cook (Residue Analysis Manager)
Bob Robinson (Metabolism Manager)
Don Carlson (Product Development Manager, Herbicides)
Joe Sipia (Manager, Product Registration)
Eunice Cuirle (Registration Specialist)

Sincerely,



Eunice M. Cuirle
Registration Specialist

cc: Frank Sanders
Robert J. Taylor



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 12 1986

Ms. Eunice M. Cuirle
 FMC Corporation
 Agricultural Chemical Group
 2000 Market Street
 Philadelphia, PA 19103

Dear Ms. Cuirle:

Subject: Command 6 EC Herbicide
 EPA Registration Number 279-3054
 Command 4 EC Herbicide
 EPA Registration Number 279-3053
 Command Technical
 EPA Registration Number 279-3052
 Your letter of June 3, 1986

The Agency has received the subject letter required by Section 6(a)(2) of FIFRA regarding Command Herbicide carryover and off-target movement. We have also received reports from State agencies concerning numerous incidents of chlorosis in non-target plants. It is our understanding that ~~Eunice Cuirle of FMC~~ will deliver reports from FMC's files on Thursday, June 12, 1986, ~~per our request.~~

Due to the severity of these problems we request that you, through the Product Manager, arrange a meeting between your representatives and Agency personnel to discuss the above issues. The discussion should focus on the following:

1. Has a method of detection been validated for raw agricultural commodities other than soybeans (we are especially interested in non-lipid raw agricultural commodities)?
2. What is the limit of detection for these methods, if there are others available?

696

		CONCURRENCES			
SYMBOL	15-767-C	3-767C			
SURNAME	Yowell	adypk			
DATE	6/12/86	6/12/86			

EPA Form 1320-1 (12-70)

OFFICIAL FILE CO

4

3. Explain the apparent absence of volatility in the aqueous and soil photolysis studies (both by J. Wu dated 6/13/85; FMC corporation study number 164E12E02, P-1136 and 164E12E02, P-1137)?

For both studies, it appears that after 30 days and "moving air" conditions, only about 6% of the applied chemical was volatilized and caught in traps in the aqueous photolysis study (and less than 1% in the dark control) and less than 1% of the applied chemical was volatilized and caught in traps in the soil photolysis study (similar results were found in the dark control).

4. The Agency requests your explanation on the cause of the off-target movement and the length of time observed for carryover damage seen in the field. The Agency also requests information on plant recovery that has been observed.

5. You should be prepared to discuss your plans and proposed methods to alleviate the damage potential observed in the carryover and off-target movement.

6. You should be prepared to discuss the volatility of inerts in the registered formulations of Command.

7. At the conclusion of the Experimental Use Permit, the final report did not discuss any noted off-target effects. You should re-examine your program to determine if phytotoxic effects were observed in non-target plants.

We suggest the proposed meeting be scheduled as soon as possible due to the serious nature of these problems.

Sincerely,

151
Frank Sanders, Acting Chief
Fungicide Herbicide Branch
Registration Division (TS-767C)

697

SMC Rpt. 6/23/80

OFF-TARGET SUMMARY

Report Number	Rep	Complainant	Town & State	Species	Seriousness	Applic. Method	Comments-dated
1	Christensen		St. Charles, MO	Lettuce	Spotty	PPE	Grower is eating lettuce - symptoms minor.
2	Connors		Haverly, IL	Trees in pasture	?	PI	Reported by dealer, Jim Koplein, Farmers Elev., Laxber, IL Concerned dog and goat died for 2nd grower 5/15 [redacted] called provided same info
3	Buffington		Bridley, IL	Lettuce, Radish, Apple, Maple	Yes White trees	PPE	Grower will eat after turns green but concerned Report Less Garner, Growmark, Bloomington, IL Rep notified
4	Dickerson		Bibson, IA	Alfalfa	Minor	ORE	10% into alfalfa field - some degree white
5	Wagoner		Casey, IA	Ornamentals			4/17 sprayed - road bank growing out Others growing out 5/15 recovered
6	Head		Meadow, IL	Gov. Oats	2		Grower not concerned - relatives' oats
7	Head		Lexington, IL	Ornamentals Pond	10		IL Dept. Ag involved - residue sample water
8	Zeman		Franklin, IL	Heinz Tomatoes			Currently under investigation
9	Connor		Atlanta, IL	Gov. Oats	2		Third party
10	Connor		Atlanta, IL	Gov. Oats	2		1/8 mile away
11	Connor		Deland, IL	Roses	1		No problem
12	Connor		Dawson, IL	Ornamentals	5		No inquiry yet
13	Hooten		St. Peter, IL	Wheat/Ornamentals	10		IL Dept. Ag involved Residue sample wheat
14	Duer		Ohio	Apple Orchard			Improving
15	Wagner		Michigan	Three hives-Trees, etc.			
16	Krotz		Bucrus, KS	Plants, Clover Trees		P&E	Serious drift - ins. paying Residue samples - Command 240
17	Buffington		Peoria, IL	Peas, Radishes			Spray by Oster, Martin price, movement 60-70 drift.

PRIVACY ACT EXEMPTION

869

6

OFF-TARGET SUMMARY

Report Number	Rep	Complainant	Town & State	Species	Seriousness	Applic. Method	Comments-dated
18		[REDACTED]	Vinton Benton Garrison, IA	Raspberries Alfalfa Oats	Sprayed 5/5		Ready cut-symptoms 5/16 Alfalfa - 100' x 150' 2/1 mile long 14 acres discolored New crop 17 acres 1/2 acres
19	Fawcett	[REDACTED]		Oak trees Garden Ash Radishes			Moist soil - 1/4 mile, oak trees
20	Winter	[REDACTED]	Elgin, IL	Tomatoes			Dealer - Joy Feed, Don Miller 15 acres, tops white for 8 inches
21	Cashan	[REDACTED]	Walter, IA	Garden Trees			Peas/beans - soil wet - drift 200 ft. Killed lettuce/radishes
22	Thompson	[REDACTED]	Royal Center, IN	Apples/Mulberry/ Other Garden			All trees, garden white Garden, radishes, etc. white
23	Tomine	[REDACTED]	LaCrosse, IN	3 gardens			
24	Luedtke	[REDACTED]	Boshola, IA	S/B - Oats 6'-8"			10-40 feet drift - rain after application
25	Luedtke	[REDACTED]	Boshola, IA	S/B - Alfalfa			10-40 feet drift - rain after application
26	Winter	[REDACTED]	Galva, IL	Sov. Oats	2		30A of 80
27	Winter	[REDACTED]	Muscatine, IL	Heinz Tomatoes			Currently under investigation
28	Zeman	[REDACTED]	Chapin, IL	Alfalfa/Oats Willow	4		Oats for grain Residue sample taken on oats
29	Zeman	[REDACTED]	Chapin, IL	Corn/Oats Ornamentals Around home	8		
30	Zeman	[REDACTED]	Mason City, IL	Oats/Alfalfa	4		Alfalfa underseeded with oats
31	Raker	[REDACTED]	Warren, IN	Garden	1		
32	Thompson	[REDACTED]	Billage Green Etna Green, IN	Trees, fruits Garden			Sprayed 5/14 - 219/858-2537 - 5 ft. from field drift - garden
33	Novotny	[REDACTED]	Pierce, NE	Corn			Corn white - some dying. Wants to replant Drift 2 fields 2 adjacent rows, 1 field, 12 rows

PRIVACY ACT EXEMPTION

Dealer: Conino
Grower: [REDACTED]

659

7

OFF-TARGET SUMMARY

Report Number	Rep	Complainant	Town & State	Species	Seriousness	Applic. Method	Consents-dated
34	?	[REDACTED]	Clinton, IL				5/16 - 8-10 acres corn 7-8 inches white Kojax - corn
35	Engard	[REDACTED]	Hampton, MN	Alfalfa			5/22 - White
36	King	[REDACTED]	Lewiston, MI	Trees, alfalfa			5/22 - Sprayed - 5/8 - 2 wks. later top half white 300-500 ft., 30-40% field white
37	Weminger	[REDACTED]	Winchester, WI	Oats			5/22 - Oats 100 ft.
38	Schaneman	[REDACTED]		Trees, alfalfa Weeds Oats (tips)			5/22 - Rended low pressure system Pre 200+ yds. winds 25-30 mph, treated dust moved
39	Todd	[REDACTED]	Fairfax, MO	Garden			5/22 - Will recover
40	Klug	[REDACTED]	Patron Coop Black Earth	Trees Garden	5		5/22 - Sprayed 5/10 - wk. of rain after
41	Dobbins?	[REDACTED]	Ferdinand, IN	Corn	5		5/22 - Applied 5/10 - Heavy rain runoff into neighbor's corn - white
42	Blone	[REDACTED]	Neola FS Hazelton, IA	Alfalfa	5		5/22 - 300 ft. into field white Need to harvest
43	Luedtke	[REDACTED]	Dunbar, IA	Begonias House plant			5/22 - Drift 1/4 mile - white in 1 day 10-15 mph
44	Dickerson	[REDACTED]	Washington, IA	Alfalfa Soil - Beans			5/22 - Alfalfa 10% - Organic farmer concerned about residue chemical soil
45	Nelson	[REDACTED]	Molvall, IA	Corn Garden			5/22 - Corn sprayed with contaminated tank Garden
46	Nelson	[REDACTED]		Trees Alfalfa			5/22 - 10-20 ft. white
47	Krotz	[REDACTED]		Willows Trees Fence rows			5/22 - 1/2 pint Command w/Treflan

PRIVACY ACT EXEMPTION

700
8

1786 COMMAND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Brower	Town & State	Soybean Rate/Applic.	1985 Treat. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
1		Hayes/TIH02		Hayline, MO	1.25/PPI/PRE	5/20	Corn		?	3	1 Mostly end rows
2		Krotz/BKS06		Hiawatha, KS	1.00 PPI	5/1	Corn		Unknown	4	1.0 probably won't be a problem.
3	L	Kinsinger/RNK99		Dowhatta, KS	?	?	Corn		Stauffer 8505 Bothers & Funk	7 8	General over the field - 1 lb. rate 3/16
4	L	Dickerson/DDD03		Washington, IA	1.00 PRE	5/13	Corn		Stauffer 5340 supercross no.	7	5/16
5	L	Dickerson/DDD01		Mappello, IA	?	5/11	Corn		?	7	Sounds like it's going to be bad. 1 1/4 lbs.
6		Buffington/KRB11		Chaddsworth, IL	1.00 PRE	5/22	Corn		Pioneer 3377 bad Cargill 937 good 603?	5	1 lb. general but worse overlap going out of
7		Head/RKK15		Saybrook, IL	1.00 PPI	5/9	Corn		?	6	1 lb. general worse overlap is coaing out
8		Buffington/KRB10		Pekin, IL	1.00 PRE	5/14	Corn		Various	5	5/16
9	L	Buffington/KRB04		Laura, IL	1.00 PPI	5/3	Corn		Pioneer 3377 Garst 8388 Supercross 5415	6	1 lb. coaing out of it
10	L	Buffington/KRB13		Brimfield, IL	1.00 PPI	4/27	Corn		Heffelos 48	7	1 lb. coaing out of it
11	L	Buffington/KRB16		Elwood, IL	1.00 PRE	5/20	Corn		?	7	1 lb. coaing out of it
12	L	Buffington/KRB02		Deer Creek, IL	1.00 PRE	5/08	Corn		?	4 6	Slight injury 5/16
13	L	Buffington/KRB12		Galesburg, IL	1.00 PRE	5/21	Corn		?	4 6	Slight injury 5/16
14	L	Burgard/LAB06		Findlay, OH	1.00 PRE	5/04	Corn		DeKalb T1100 Pioneer 3377	9	1 1/4 lb. - probably going to be a problem
15		Roth/TRK04		Maple Park, IL	1.00 PRE	5/07	Corn		?	?	1 lb.
16	L	Roth/TRK05		DeKalb, IL	1.00 PRE	5/21	Corn		?	8	1 lb. problem
17		Roth/TRK12		St. Ann, IL	1.00 PRE	5/10	Corn		?	6	5/16 - 1lb.
18		Dwan/HL011		Henros, NE	1.00 PRE	5/22	Corn		?	?	

PRIVACY ACT EXEMPTION

701

6

1986 COMMAND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep./Trial Number	Grower	Town & State	Soybean Rate/Applic.	1985 Treat. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
19		Schanean/6AS06		Aurora, NE	1.00 PRE	5/21	Corn		?	?	
20		Schanean/6AS07		Aurora, NE	1.00 PPI	5/05	Corn		3377	4	5/16 - 50% early, 20% today
21		Kelley/RKX07		Henderson, IL	1.00 PPI/PRE	5/24	Corn		?	?	
22		Kelley/RKX19		Casargo, IL	1.00 PPI/PRE	5/07	Corn		?	4	
23		Kelley/RKX06		Allerton, IL	1.00 PRE	5/11	Corn		?	4	
24		Vaupel/6AS05		Bruning, NE	1.25 PRE	5/24	Corn		?	5	Worse earlier
25		Luedtke/TCL01		Kellogg, IA	1.00 PRE	5/18	Corn		?	?	
26		Luedtke/TCL08		Newton, IA	1.00 PRE	5/22	Oats & Corn		?	?	Oats showing
27	L	Luedtke/TCL02		Story City, IA	?	5/16	Corn		?	?	End rows spotty
28		Wagoner/NDH05		Atlantic, IA	1.00 PPI	5/26	Alfalfa & Corn		?	?	Alfalfa is showing spotty in the field
29		Conner/RKX05		Rochester, IL	1.00 PPI	5/04	Corn		?	6	Coming out of it
30		Conner/RKX16		Windsor, IL	1.13 PPI	5/09	Corn		?	6	Coming out of it
31		Conner/RKX01		Marequa, IL	1.00 PPI	5/04	Corn		?	3	Spotty
32	L	Conner/RKX13		Clinton, IL	?	5/11	Corn		Thorp seed and has alot of varieties	8	
33	L	Burgard/LAB08		Delphos, IL	1.25 PRE	5/14	Corn		Pioneer 3475 Beck's 51X	6	Spotty & general
34		Vaupel/6RV08		Belvidere, NE	1.00 PPI	5/21	Corn		Pioneer 3377	5	Spotty end rows
35		Lauber/BCL19		Greenwood, NE	1.00 PRE	5/30	Corn		?	5	Spotty end rows
36	L	Roth/TKR03		Haward, IL	1.00 PRE	5/13	Corn		?	8	
37	L	Dickerson/DDD13		South English, IA	1.00 PPI	5:20	Corn		?	8	Overlaps yellowing
38	L	Winter/RLW12		Princeton, IL						9	5/16

PRIVACY ACT EXEMPTION

702

10

1986 COMMAND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Grower	Town & State	Soybean Rate/Applic.	1985 Treat. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
39		Raker/EDT07		Silver Lake, IN	1.00 PRE	5/22	Corn		?	?	100% Overlap
40		Raker/EDT08		South Whitney, IN	1.00 PRE	4/30	Corn		?	?	Small plot - growing out of it
41		Tutt/SFT		Maseca, MN Univ. of MN	?	?	Oats		?	?	60% discolored
42		Thompson/EDT04		Converse, IN	1.00 PRE	5/10	Corn		?	?	1.0 pre
43		Thompson/EDT14		Marion, IN	1.00 PPI	5/15	Corn		?	?	1.0 pre
44	L	Thompson/SRB07		Elwood, IN	1.25 SB	5/19	Corn		?	?	1.25
45		Wagoner/MDH02		Jefferson, IA	1.00 PPI/PRE	5/15	Corn		?	?	General till. No stand loss 20-30% white No till stand loss 10-15% 80-100 white
46		Lauber/BCL04		Toledo, IA	1.00 PPI/PRE	5/22	Corn		?	?	1.00 AI Incomp - 15% D. color 4 Command treatments OK
47		Klug/AFK03		Belaont, MI	1/20 PRE	5/20	Corn	4/24	Hugh 5104	?	End rows
48		Schanehan		Shelby, NE	1 pt. 41.00	?	Corn		?	?	General discolor Tilled
49	L	Roth/TKR06		Grand Ridge, IL	1.00 PRE	5/29	Corn		?	?	1.0
50		Burgard/LAB18		Delphos, OH	1.00 PRE	5/8	Corn		?	?	1.25
51		White/JRH02		Wilmington, OH	1.00 PRE	5/10	Corn		?	?	PPI predominant - spotty 50% plants - discolored 50%
52		Barry/SRB08		Rushville, IN	1.00 SB PPI	?	Corn		Pioneer 3378	?	Spotty - 1% affected plant 15-100%
53	L	Barry/SRB09		Brownsberg, IN	1.13 SB	4/29	Corn	4/29	PAG 329	?	Heavy areas - general 65% - avg. 30% - some dying
54		Barry/SRB21		Rushville, IN	1.00 PRE	6/27	Corn		Delta 636	?	Two weeks after planting - rain Ranges 15-100% recovery
55	L	Wagoner/MDH01		Vail, IA	1.13 PPI/PRE	5/5	Corn		?	?	Avg. 80-100 field spots - no till Stand loss 1-2%, 7/20
56	L	Wagoner/MDH08		Coon Rapids, IA	1.00 PRE	5/25	Corn		?	?	Spiking - seed corn field - general male 100% Spot white, balance OK
57		Thompson/EDT18		Sharpsville, IN	1.00 PRE	5/10	Oats		?	?	End rows

PRIVACY ACT EXEMPTION

703

11

1986 CORN AND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Grower	Town & State	Soybean Rate/Applic.	1985 Insect. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
58	L	Novokny/DNR08		Canton, SD	1.00 PRE	5/20	Corn	?	?	8	
59	L	Rosine/BUR05		Kentland, IN	1.13 PPI	5/29	Corn	?	?	7	Mostly end rows
60		Rosine/BUR21		Logansport, IN	1.00 PRE	5/1	Corn	?	?	?	
61		Rosine/BUR11		Boswell, IN	1.13 PPI	5/7	Corn	?	?	5	Overlap, slight general 15% overall
62		Rosine/BUR13		Fowler, IN	1.00 PPI	5/24	Corn	?	?	6	
63		Rosine/BUR08		Williamsport, IN	1/13 PPI	4/29	Corn	?	?	1	Very slight
64		Schaneman/GAS		?	?	?	Corn	?	?	8	Will be stand loss - general Ridge till
65		Burgard/LAB10		Holgate, OH	1/25 PRE	5/8	Corn	4/29	Northcoast 2515	6	30-40% plants - no till General 8-10% will recover
66		King/JDK12		Lewiston, MN	1.00 PRE	5/25	Corn	?	?	1	Spots minor General 8-10% will recover
67		Schaneman/GAS08		Central City, NE	1.00 PRE	5/18	Corn	?	?	1	Scattered plants
68		Dhaan/?		Uehling, NE	?	?	Corn	?	?	?	
69		Dhaan/ML015		Dakota City, NE	1.00 PRE	5/28	Corn	?	?	7	15% severe, 1 dead
70		Thompson/EDT17		Sharpsville, IN	1.00 PPI	5/13	Corn	?	?	5	1.0
71		Burgard/LAB02		Delphos, OH	1.00 PRE	5/8	Corn	?	?	3	Sandy hill showing
72		Hagoner/MDH07		Missouri Valley, IA	.75 PRE	5/20	Corn	?	?	5	
73	L	Kelley/RXK08		Rantoul, IN	1.00 PRE	5/10	Corn	?	?	7	
74		Hooten/RSH29		Pineville, IN	1.00 PRE/PPI	5/21	Corn	?	?	5	40%
75		Rosine		Deer Creek, IN	?	?	Corn	?	?	?	
76		Rosine		Crawfordsville, IN	?	?	Corn	?	?	?	
77		Marken/CKM06		Orchard, IA	1.00	?	Corn	?	Flippier 3737	1	Less than 1%
78		Marken/CKH14		Osage, IA	1.00	?	Corn	?	?	2	Spotty
79		Marken/CKH19		Rockwell, IA	1.00	?	Corn	?	?	2	End rows

PRIVACY ACT EXEMPTION

704

21

1986 COMBAND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Grower	Town & State	Soybean Rate/Applic.	1985 Insect. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
80		King/?		Elgin, MN	1.25	5/20	Corn	5/2/86	Stauffer 5340	2	Spotty - 10% low area more effect 30 acre PRE 1 pass digger 5/22 - 20-30%, general spots 20-100%
81		Tutt/?		Waseca, MN	1.25, 2.5	?	Corn	?	?	?	35% white
82		Novotny/?		Orchard, NE	0.75						
83		Miska/?		Medina, MN	1.00						50% white
84		Miller/?		Glidden, IA	1.16 PPI		Corn				General 40% white
85		Weber/WRH18		Napoleon, OH	1.125		Corn			5	Sandy - white 40-80%
86		Weber/WRH16		Dan Road, OH	1.125 PPI		Corn			2	Overlap only
87		Barry/SMB02		Mordsville, IN	1.25	5/20	Corn	4/27	Wecford 2520		75% avg 20% range - 25-100%
88		Barry/SMB21		Greenburg, IN	1.0 PRE 1.25 PPI	5/8	Corn	4/29	Seed Corn	1	Spots/dicoloration very little
89		Nelson/SNM03		Reason, IA			Dekalb corn plot				Severe white general
90		Nelson/SNM05		Sargent Bluff, IA							
91		Nelson/SNM10		Arrelia, IA							
92		Nelson/SNM?		Spencer, IA			Corn				Research plot for Dekalb seed corn
93		Schaneman/?					Corn			6	Spotty - General - Should core back
94		Blone/?		Hudson, IA	1.0		Corn		Seed	2	General 10%
95		Blone/?		Hudson, IA			Corn				General 60%-80% - Blaube Research Plot
96		Blone/?		Sumner, IA	1.0		Corn				Overlaps pre none No till PPI spot - 30-40%
97		Cashman/?		Eldridge, IA	1.0		Corn				
98		Buffington/RSB14		El Paso, IL	1.3351 PRE	5/14	Corn	4/29/86	Various	5	Spots 40%
99		Buffington/RSB05		El Paso, IL	1.3351 PRE		Corn	4/29/86	6 Hybrids	0	
100		Roth/TPR05		Dekalb, IL	1.41 PRE	5/21	Corn			85-90	General very even

PRIVACY ACT EXEMPTION

705

13

1985 CORN CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Brower	Town & State	Soybean Rate/Applic.	1985 Treat. Date	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
101		Winter/RLW02		Buda, IL	1.33PT PRE	5/23	Corn	4/21/86	FicVering 484	0	
102		Winter/RLW10		Erie, IL	1PT, 1.5PT PRE	5/13	Corn	4/16/86	Cargill 896		25 end rows only
103		Winter/RLW05		Geneseo, IL	1.33PT PPT 1.33PT PRE 1.33PT + .25ai Sencor		Corn		Agripro Seed Field	100/80	Male up only will be rechecked when female emerges
104		Winter/RLW03		Macomb, IL			Corn		DK 11100	10/65	
105		Roth/RKX11		Thomasboro, IL	1.4PT PRE	5/24	Corn	4/17-18/86	15 varieties		General
106		Conner/RKX14		Clinton, IL	1.33PT PRE		Corn		Varieties Inbreds	65/30	General
107		Conner/RKX02		Macon, IL	1.5PT PRE 1.5PT PPT 1.5PT + 3/8ai Sencor		Corn			10/40 5-100	Generally spotty End row overlap all evident
108		Conner/RKX10		Lincoln, IL			Corn			10/40	
109		Conner/RKX07		Clinton, IL			Corn			2	Spotty
110		Conner/RKX18		Warrensburg, IL			Corn			5	General
111		Conner/RKX04		New Berlin, IL			Corn			0	
112		Conner/RKX17		Pleasant Plains, IL			Corn			3	General
113		Zeean/RKX03		Jacksonville, IL			Corn			1	End rows
114		Crowell/RKX15		Sandoval, IL	1.33PT PRE	5/20	Corn	4/24/86	Pioneer 3759	4	End rows spotty
115		Romine/RKX03		Perney, IN	1.55PT PPT 1.5PT SR	5/11	Corn	4/27/86	Supercrest 5432	50/40	General
116		Raker/EDT02		Buffton, IN			Corn			65/45	General - Seed corn 70% affected - 60% female rows
117		Raker/EDT12		Huntington, IN			Corn			10	
118		Raker/EDT13		Huntington, IN			Corn			10	

706

PRIVACY ACT EXEMPTION

41

1985 COMMAND CARRYOVER COMPLAINTS

Report Number	Potential Stand Loss/Liability	Rep/Trial Number	Grower	1985 Treat. Date	Soybean Rate/Applic.	Town & State	Crop	Planting Date	Variety	Severity Rating (1-10)	Comments (dated): General Vs. Spotty (Overlap)
119		Raker/ED119				Warren, IN	Corn			10	Spotty overlap area
120		Thompson/ED101			1.33 PT	Portland, IN	Corn			5	End rows
121		Thompson/SRB03			1.6PT	Muncie, IN	Cats				
122		Thompson/SRB06			1.33PT	Arcadia, IN	Corn			40	General
123		Thompson/SRB14			1.33PT	Middleton, IN	Corn	4/19/86	Becls 611	11/40-60	Spotty
124		Thompson/SRB18			1.5PT	Farmland, IN	Corn	4/21/86	Pioneer 3377	10/60	Spotty overlaps
125		Harper/PET07		7/1/85	1.2 lbs.	Marshall, MO	Corn	4/17/19	Funks 4322 4500 4507		General 2-5 - No variety difference High rate and late 1985 application Spotty 1% stand loss
126		Novotny/?				Bereford, SD	Corn				Spotty overlaps
127		Miska/JFH03				Dartur, MN	Corn			2	General 5-10% Spotty end rows - 80% max
128		Miska/JFM19				Steep Eye, MN	Corn			1	Improved in 3 days End rows - spot 40%
129		Barry/SNB10			1.00	Bergstown	Corn	4/25	Pioneer 3378		5/23 - 15% general at 65" Some plants died about 10%
130		Engbard/?			1.0-1.2 lbs.	Hastings, MN	Corn		Seed corn	?	5/23 - Plants corn up 80% white Turn 100% white 2-15 acres
131		Thompson/SRB19		5/10	1.25	Union City, IN	Corn	5/16	Pioneer	5	5/23 - 5% general discolored 40-65%
132		Thompson/SRB13		5/8	1.2 lbs.	Atlanta, IN	Seed corn	5/6	Pioneer	7	5/23 - General 90% discolored 40-100%
133		Thompson/SRB04		6/1	1.0	Knightstown, IN	Corn	5/6	Pioneer 3378	4	5/23 - End rows - 5% discolored 50-80%



125401

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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memo of Meeting

6/18/86

Met with representatives of FMC to discuss the off-target photo-toxicity problems that have been reported for dimethazone (COMMAND).

FMC states that in most cases, affected plants recover. Also, volatility was not noticed in the soil photolysis study done in 1985 because the a.i. was applied to dry soil. EAB will need data comparing application to both dry and wet soil and subsequent volatility.

Sam Creeger and not moist soil.
Samuel M. Creeger

708