

US EPA ARCHIVE DOCUMENT



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

SEP 7 1989

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Request to Waive Aquatic Nontarget Plant Data for Sulfosate

FROM: James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

TO: Cynthia Giles, PM 25
Fungicide/Herbicide Branch
Registration Division (H7505C)

Ecological Effects Branch (EEB) in a review dated July 10, 1989 required submission of additional nontarget aquatic plant data for Sulfosate (TOUCHDOWN® CONCENTRATE and TOUCHDOWN® 4LC) based on proposed use of these two products on noncrop areas around the farm. The use sites included farmyards, fuel storage areas, fence rows, rights-of-way, soil bank land, and barrier strips.

The additional data were required because EEB was concerned that information on the label could be misinterpreted to allow use on rights-of-way and other noncrop areas not closely associated with agricultural areas.

To alleviate this concern, ICI in a submission dated August 10, 1989 has modified their label to clearly restrict use of TOUCHDOWN® CONCENTRATE and TOUCHDOWN 4LC to agricultural areas around the farm. These label changes eliminate the need for further aquatic nontarget plant testing.