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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

SUBJECT: Review Of Labeling And Data Tables For New Use  
Of Touchdown Herbicide On Citrus.

FROM: James W. Akerman, Chief  
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TO: Cynthia Giles, PM 25  
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Registration Division (H7505C)

The proposed labels for use of sulfosate (Touchdown Concentrate, Touchdown 4LC, and Touchdown 6) herbicide on citrus have been reviewed. Based on a review of EEB files, there are no data requirements outstanding. However, because citrus groves are associated with estuarine/marine habitats, the following estuarine/marine toxicity tests are now required (Subdivision E, 72-3):

- 96 hour shrimp acute toxicity
- 96 hour fish acute toxicity
- 48 hour mollusc embryo larvae acute toxicity

Previous EEC calculations for sulfosate were based on a maximum label rate of 4 lb. active ingredient per acre per year. The proposed citrus labels (Concentrate, 4LC, and 6) are confusing with regard to the maximum amount that can be used per acre per year. All three labels have the general statement "Do not apply more than a total of 4# active ingredient of Touchdown herbicide per acre per year." However, the maximum use rates are higher than 4# active ingredient per acre as follows:

-Touchdown Concentrate - page 9, up to 123 fl. oz. are recommended per acre for perennial weed control. This totals 5.05# active ingredient per acre.

-Touchdown 4LC - page 9, and page 11, 10 pints/Acre are allowed. This totals 5.0# active ingredient per acre.

-Touchdown 6 - page 10, up to 7.25 pints are recommended per acre. This totals 5.44# active ingredient per acre.

These maximum use rates must be lowered to 4# active ingredient per acre per year.

The proposed sulfosate labels (Touchdown Concentrate and Touchdown 4LC) have the statements "Do not apply to any body of water, wetlands, or other aquatic habitats." Statements regarding "wetlands" are no longer allowed on labels by EEB because of definition conflicts with other federal agencies. Instead, the following statement is now used: "Do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark."