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

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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Data Requirements for Conditional Registration of Quizalofop-Methyl (Assure Herbicide)

FROM: Emil Regelman, Head
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Exposure Assessment Branch 

TO: Robert Taylor, Product Manager
Registration Division (TS-767c)

THRU: Robert W. Holst, Deputy Chief
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Pursuant to this morning's meeting, here is a summary of the data requirements to be conditionally imposed on the registration of Assure Herbicide:

§165-1 Confined Accumulation in Rotated Crops.

The study should supplement existing Rotational Crop data by providing information on the fate of phenyl-labelled Quizalofop Ethyl in soil and rotational crops representing the three major crop groups (small grain, leafy vegetables and root crops), and must include analysis of soil for the HO-Phenol-4 degradate.

In a follow-on conversation with DuPont, I suggested that their concern about the 120-day rotational interval to be included on the label could also be addressed by this new study. Specifically, since the current (partially acceptable) study was conducted at 2x the anticipated maximum rate of 1/4 lb ai/a, crop residue were likely to have been higher than under actual (lower rate) use conditions.

Assuming DuPont did not anticipate increasing the rate above 1/4 lb ai/a (or the number of annual applications above one) in the future, then the to-be-submitted confined study could be conducted at 1.1x the 1/4 lb ai/a rate, for both 30 and 120 days, for both the quinoxaline and phenyl labels (in separate experiments). This way, the rotational restriction might conceivably be reduced to 30 days, or eliminated entirely. EAB would have no objection to reviewing both protocols in advance of the studies, if desired.

CC: P. Schuda
D. Spatz
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