

UNDATED

Don Carlson
Registration Specialist
FMC Corporation
Agricultural Chemical Group
1735 Market Street
Philadelphia, PA 19103

Dear Mr. Carlson:

Subject: Command 4 EC
EPA EUP No. 279-3053
Re: Amended Registration (Add Tobacco to Label)
Your Submission dated January 10, 1992

Please find the attached Review dated February 5, 1991 which addresses residue chemistry concerns relating to the above mentioned submission. Following are some concerns highlighted in the attached review.

Labeling

The post-treatment is listed as a "preemergence" treatment on the label. The label should be clarified as to whether the use is intended as a pre-emergence treatment for weed and not as pre-emergence treatment for tobacco. In addition, a statement specifying a maximum of one application per season with a maximum application rate of 2.0 pints per acre (1.0 lbs ai/A) is needed as this is indicative of the residue data. The label should also specify applications in a minimum of 20 gallons per acre as this is reflected by the field data. Please see attached review for additional comments.

Analytical Method

The submitted method was properly validated for use with tobacco, but be advised that if you wish to add additional applications to the label and the corresponding residue data shows levels above 0.10 ppm in the green tobacco then the method will need to be validated to a LOQ of 0.10 ppm in the cured tobacco. Please also note that if this method is used to support a future petition for a tolerance, it may need to be independently validated and subsequently published in PAM II. Please see attached review for additional comments.

CONCURRENCES

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Please note the that your submission is still under review regarding the issue of off-target exposure.

Please contact me if you have any questions regarding this matter.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (H7505C)

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