

2-12-92

D170952
DPBARCODE (RECORD)
028201
SHAUGHNESSY NO

EEB REVIEW

REVIEW NO.

DATE IN: 11-14-91 OUT: 2-12-92
ASSIGNED: 11-19-91
CASE # : 818688
SUB. # : S406606
ID # : 028201

DATE OF SUBMISSION 2-5-91
DATE RECEIVED BY EFED 11-12-91
SRRD/RD REQUESTED COMPLETION DATE 12-3-91
EEB ESTIMATED COMPLETION DATE 12-03-91
SRRD/RD ACTION CODE/TYPE OF REVIEW 625 6A2 REREG
MRID #(S)

DP TYPE 001
PRODUCT MANAGER, NO. WALTER WALDROP 71 TERRI STOWE
PRODUCT NAME(S) PROPANIL
TYPE PRODUCT HERBICIDE
COMPANY NAME ROHM AND HAAS CO
SUBMISSION PURPOSE REVIEW 6A2 DATA: FAILURE OF PERFORMANCE
OF HERBICIDE, ALSO IDENTIFY ALL DATA
REQUIREMENTS, NOTE DATA GAPS
COMMON CHEMICAL NAME
REVIEWER: CANDY BRASSARD

DP BARCODE: D170952

REREG CASE #

CASE: 818688
SUBMISSION: S406606

DATA PACKAGE RECORD
BEAN SHEET

DATE: 11/08/91
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REREGISTRATION ACTION: 625 6(A)(2) REREG. SPE. REVI
CHEMICALS: 028201 3',4'-Dichloropropionanilide 100.00 %

ID#: 028201

COMPANY:

PRODUCT MANAGER: 71 WALTER WALDROP 703-308-8062 ROOM: CS1 3B3
PM TEAM REVIEWER: TERRI STOWE 703-308-8043 ROOM: CS1 3D5
RECEIVED DATE: 02/05/91 DUE OUT DATE: 03/07/91

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 170952 EXPEDITE: Y DATE SENT: 11/08/91 DATE RET.: / /
CHEMICAL: 028201 3',4'-Dichloropropionanilide
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 12/03/91 CSF: N LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	11/12/91	/ /
BRAN: EEB	/ /	/ /
SECT:	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

* * * DATA REVIEW INSTRUCTIONS * * *

ATTENTION: 6(a)(2) FAILURE OF PERFORMANCE INCIDENCE REPORT
- PROPANIL RESISTANT BARNYARDGRASS - ORIGINALLY
SENT TO JIM ACKERMAN ON 02/12/91

This 6(a)(2) failure of performance incidence report for Propanil resistant barnyardgrass was originally sent to Jim Ackerman on 02/12/91 via the OLTS bean sheet system. I also sent a copy to Bob Taylor (RD/FHB/PM25). I have not received a review to date. Please let me know if this report has been reviewed/addressed and if any further action needs to be taken. Please send a copy of the review or contact me as soon as possible:

Terri Stowe
SRRD/RB (H7508W)
Crystal Station I
308 - 8043

THANK YOU!!!

In addition, for the attached reregistration case, please identify all applicable data requirements and note those for which adequate data have not been submitted to the Agency (identify data gaps (old and new) and indicate which GLNs are satisfied).

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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2



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

FEB 12 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Review of 6(a)(2) Data for Propanil

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H-7507-C) *2.12.92*

TO: Walter Waldrop, Product Manager Team 71
Reregistration Branch
Special Review and Reregistration Division (H-7508-C)

The Ecological Effects Branch (EEB) was requested to review the attached 6(a)(2) data indicating that propanil is not efficacious in controlling barnyardgrass. It appears from the article in the Delta Farm Press on January 11, 1991, written by Ford Baldwin, that propanil was tested both in the greenhouse and outdoors, and the data indicate that there are resistant grass. Research was to be continued the following year.

EEB consulted with Dennis Szuhay in the Biological Analysis Branch, BEAD, and was in agreement that the Agency should request all efficacy data that the registrant has prepared to date, and that the data be forwarded to Dennis Szuhay for review.

In response to Terry Stowe's (SRRD) concern for additional data requirements, EEB has determined that the following phytotoxicity data are required since the chemical can be applied with aerial equipment:

Guideline Reference No.	Study Type
123-1	Tier II- Seed germination/ seedling emergence/ vegetative vigor.
123-2	Tier II- Aquatic Plant Growth
201-1	Droplet Size Spectrum
202-1	Drift Field Evaluation



The submitted information does not change EEB's presumption of risk for propanil. The required testing, however, may indicate concern for effects to non-target plants. Once these data are submitted, the 201-1 and 202-1 should be forwarded to the Environmental Fate and Groundwater Branch for review. EEB will review the remaining phytotoxicity studies. If you have questions, please feel free to contact, Candy Brassard at 305-5392.

*Sent to Jim R/S
Alkerman 02/12/91
020201*



January 23, 1991

Ms. Terri Stowe
Office of Pesticide Programs
Special Review & Reregistration Branch (H7508C)
Document Processing Desk (RS-0226)
U. S. Environmental Protection Agency
Room 266A - Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Dear Ms. Stowe:

Subject: .Chemical Name - Propanil (STAM®)
.Case Number - 0226
.Failure of Performance Incidents

This report is being submitted under provision of FIFRA §6(a)(2) since propanil is in the reregistration mode (List A chemical) and a series of incidents (which are not a threat to human health) has been reported in which propanil has failed to perform as claimed against designated target organisms.

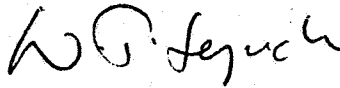
Attached is an article by Mr. Ford Baldwin which appeared in the 1/11/91 issue of DELTA FARM PRESS. In the article Mr. Baldwin describes six (6) fields in Poinsett County, Arkansas, in which there were reported to be failures of propanil in control of barnyardgrass (*Echinochloa crus-galli*, *E.colonum*). Preliminary greenhouse testing lends support to the conclusion that the failures were due to the presence of propanil resistant barnyardgrass.

Also attached are copies of letters sent to Mr. Robert Taylor of the Registration Division requesting approval of label amendments for propanil products which identify the potential problem and which provide directions for overcoming the problem if it is present.

RECEIVED
FEB 7 1991

If there is any other information you need, please do not hesitate to call me at 215 592-3190.

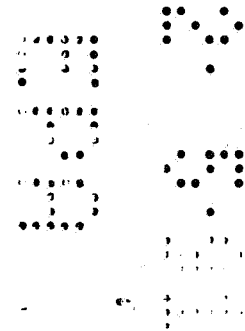
Sincerely,



William T. Lynch, Ph.D.
Product Registration Manager
Agricultural Chemicals Registration
and Regulatory Affairs Department

WTL/hew
Attachments

cc: Mr. Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (H7505C)
U. S. Environmental Protection Agency
Room 237, CM #2
1921 Jefferson Davis Highway
Arlington, Virginia 22202



No reason for panic

Barnyardgrass control failures a concern

By FORD BALDWIN
Arkansas Extension Weed Scientist

The winter meeting season began with a rice meeting at Blackfish Lake on Jan. 4. I discussed several topics that will likely "make the rounds" quickly so a couple of articles on them seem appropriate.

Before preparing slides and materials for the weed control portion of the grower meetings, R.J. Smith, Jr.; Ronnie Helms; Charlie Guy; Nathan Slaton; and myself met to collect our thoughts and decide what should be presented and how.

The point is all the weed control information I present in meetings or write about in articles isn't mine. We attempt to pull together all of the information being generated in our system, compare it to that in other states and then make sure we are in agreement as a group whether we have enough data on certain subjects to present, how we word information in MP-44, etc.

This tends to keep personal biases and opinions to a minimum.

You will recall I wrote an article back in the summer on all the barnyardgrass failures and expressed my usual confidence that all the problems could be attributed to bad weather, stress, grass too big, poor application and other things; anything but resistant barnyardgrass.

Pass the salt and pepper—because it looks as if I could have to eat another DFP article.

All of us are somewhat hesitant to present the following information because we freely admit we do not have near as much data as we would like.

However, you need to know what we know to date.

Last summer one of our county agents, Ray Siler at Harrisburg, became very adamant there was something besides "farmer mess-ups

and weather" responsible for all the problems farmers were having killing grass in Poinsett County.

He basically told me, "I have a lot of confidence in you, Charlie, Ronnie and Dr. Smith, but I also have a lot of confidence in the farmer and consultants here who are having problems.

"Some of these guys having problems are just too good to be this consistently messing up."

He and a couple of area consultants, Johnny Wheately and Danny Castle, became so convinced that they pulled barnyardgrass seed samples from 6 problem fields in the county and sent them to Dr. Smith.

It should be noted a similar thing (not necessarily from Poinsett County) happened once before years ago.

In that case Dr. Smith planted the suspected resistant seed with seed he had from a known source and found no difference in control by propanil either in the greenhouse or the field.

The problems those growers were having was obviously something other than propanil resistance and that was the end of it. Now back to 1990.

Dr. Smith took the 6 sources of Poinsett County barnyardgrass and a Stuttgart barnyardgrass source and conducted a greenhouse study.

He sprayed the grass at the proper stage of growth with 3 quarts per acre propanil killing the Stuttgart grass with little or no effect on the Poinsett County grass.

He assessed the situation and decided they must have messed up and thus repeated the study using a 5 quart and 10 quart rate of propanil.

Again, the Stuttgart grass was smoked and the Poinsett County grass was not.

The 10 pound propanil provided 50-60 percent injury on the Poinsett County grass but didn't

kill it.

I'm sure Dr. Smith will take this test to the field this spring for another look. Therefore, while we would like to have more information, you definitely have our attention.

If this turns out to be true propanil resistance there are all sorts of implications.

How widespread is it?

How fast will it spread to other areas?

If you have a failure, how do you or the company determine whether the problem was resistance or some other problem?

If it does turn out to be true resistance, the entire complexion of the research program could suddenly change.

It certainly has changed the complexion of our grower meetings.

We do not wish to create a panic situation. We are obviously creating a lot of excitement with a little dab of research.

However, we also have the field observations by the grower, agents, and consultant.

Once we know what we are dealing with we can deal with it.

It is obviously of great concern since propanil is the backbone of our rice weed control program.

However, we have alternatives and it makes getting some new products, like Facet, registered a much higher priority.

It also doesn't mean the end for propanil because we depend on it for control of a lot of other weeds besides barnyardgrass.

From here it is wait and see. We will be developing alternative barnyardgrass strategies for fields where growers are having problems.

We will push as hard as possible for the registration of Facet. From there we will just see where the research and field observation of the problem take us.

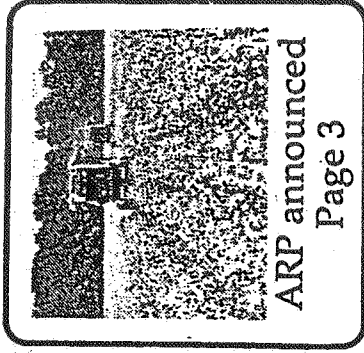
Commodity referendums on calendar...Page 6

30072460 000000191F97
JAY HOLMDAL
ROHM & HAAS
INDEPENDENCE MALL WEST
PHILADELPHIA PA 19105

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Timely, reliable information for Mid-South agriculture.



VOLUME 48

FRIDAY, JANUARY 11, 1991

NUMBER 2

Under HVI cotton classing

Growers urged to go slow in variety choice

By FORREST LAWS
Farm Press Editorial Staff

GREENWOOD, Miss. — Mid-South cotton producers should "dance with the varieties that bring them" until they get a better feel for the premiums and discounts that will be offered for strength in 1991.

That was the advice given growers by one cotton specialist at a recent meeting on high volume instrument (HVI) classing here.

The meeting was one of a series designed to help acquaint growers with the HVI classing system which USDA has announced will be mandatory for all cotton to be placed in the CCC loan beginning with the 1991 crop.

USDA has established premium



January 17, 1991

Mr. Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (H7504C)
U. S. Environmental Protection Agency
1921 Jefferson Davis Highway
Room 245, CM #2
Arlington, Virginia 22202

Dear Mr. Taylor:

Subject: STAM® M-4 (707-109)

Label Amendment - Change in Directions for Control of Barnyardgrass
(Echinochloa crus-galli, E.colonum)

Approval is requested for a footnote being added to the General Information Section of the STAM® M-4 label which indicates that, in isolated instances, certain biotypes of barnyardgrass may not be effectively controlled and directions are provided for obtaining control.

The following are attached in support of this application:

- a) Application for Pesticide Amendment - EPA Form 8570-1.
- b) Five copies of the proposed amended label.
- c) Certification with Respect to Citation of Data.

No new data are required to support this application; however, product specific data previously submitted, along with generic data identified in EPA Data Reference List prepared for the Propanil Registration Standard (EPA Case Number 0226), and data generated by the Propanil Task Force for the Propanil Registration Standard can be referenced.

If you have any questions, please call me at (215) 592-3190.

Sincerely,

William T. Lynch, Ph.D.
Product Registration Manager
Agricultural Chemicals Registration
and Regulatory Affairs Department

WTL/hew



28201

January 23, 1991

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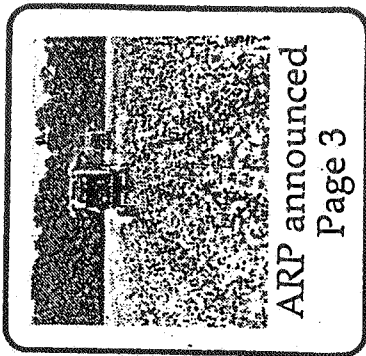
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ARP announced
Page 3

VOLUME 48

FRIDAY, JANUARY 11, 1991

NUMBER 2

Under HVI cotton classing

Growers urged to go slow in variety choice

By FORREST LAWS
Farm Press Editorial Staff

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January 17, 1991

Mr. Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (H7504C)
U. S. Environmental Protection Agency
1921 Jefferson Davis Highway
Room 245, CM #2
Arlington, Virginia 22202

Dear Mr. Taylor:

Subject: STAM® M-4 (707-109)

Label Amendment - Change in Directions for Control of Barnyardgrass
(Echinochloa crus-galli, E.colonum)

Approval is requested for a footnote being added to the General Information Section of the STAM® M-4 label which indicates that, in isolated instances, certain biotypes of barnyardgrass may not be effectively controlled and directions are provided for obtaining control.

The following are attached in support of this application:

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- c) Certification with Respect to Citation of Data.

No new data are required to support this application; however, product specific data previously submitted, along with generic data identified in EPA Data Reference List prepared for the Propanil Registration Standard (EPA Case Number 0226), and data generated by the Propanil Task Force for the Propanil Registration Standard can be referenced.

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Sincerely,

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Product Registration Manager
Agricultural Chemicals Registration
and Regulatory Affairs Department

WTL/hew

January 17, 1991

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Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (H7504C)
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Room 245, CM #2
Arlington, Virginia 22202

Dear Mr. Taylor:

Subject: STAM® 80 EDF (707-226)

Label Amendment - Change in Directions for Control of Barnyardgrass
(*Echinochloa crus-galli*, *E.colonum*)

Approval is requested for a footnote being added to the General Information Section of the STAM® 80 EDF label which indicates that, in isolated instances, certain biotypes of barnyardgrass may not be effectively controlled and directions are provided for obtaining control.

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