

9-29-86

Shaugh. No. 035506

EAB Log Out Date SEP 29 1986

Init. *SM*

Releasable

To: Ingrid Sunzenauer  
Product Manager (78)  
Registration Division (TS-767)

From: Carolyn K. Offutt, Chief *Carolyn K. Offutt*  
Environmental Processes and Guidelines Section  
Exposure Assessment Branch, HED (TS-769)

Attached please find the environmental fate review of:

Reg./File No.: 154,909

Chemical: Linuron

Type Product: Herbicide

Product name:

Company name: du Pont

Submission Purposes: Letter from Registrant changing position on  
submission of reentry data for Linuron use on asparagus

Data In: 7/16/85

Action Code 827

Date Completed: 11/27/85

EAB #: 5768

TAIS (Level II)

Days

Deferrals To:

\_\_\_ Ecological Effects Branch

\_\_\_ Residue Chemistry Branch

\_\_\_ Toxicology Branch

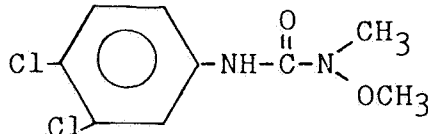
REVIEW OF REENTRY DATA

1. CHEMICAL:

Common name: Linuron

Chemical name: 3-(3,4-dichlorophenyl)-1-methoxy-1-methylurea

Structure:



Other names: CAS 330-5-2

2. TEST MATERIAL:

Not applicable

3. STUDY/ACTION TYPE:

Comment on a letter from the Registrant stating that they intend to submit reentry data for use of the herbicide on asparagus and requesting advice on data-requirements and protocol.

4. ACTION IDENTIFICATION:

July 11, 1985 letter from Richard F. Holt, du Pont, to I. M. Sunzenauer, RD.

5. REVIEWED BY:

James D. Adams, PhD  
Chemist

Environmental Processes and Guidelines Section

James D. Adams  
11/27/1985

6. APPROVED BY:

Carolyn K. Offutt, Chief

Environmental Processes and Guidelines Section

Exposure Assessment Branch, HED (TS-769)

Carolyn K. Offutt  
11/27/1985

7. CONCLUSIONS:

The Registrant intends to submit reentry data for linuron use on asparagus rather than change labels to exclude hand harvesting. I will provide protocol review(s) and advice to the Registrant as requested.

8. RECOMMENDATIONS:

My 7/9/85 recommendation to allow du Pont a waiver from the Registration Standard requirement for reentry data with respect to asparagus must now be voided.

9. BACKGROUND:

The 6/29/84 Registration Standard for linuron required submission of reentry data. Subsequent to a 6/21/85 meeting with Du Pont representatives to discuss reentry and other data requirements for linuron, I wrote a review based on comments/information presented in that meeting. I recommended that reentry-data requirements should be waived for all uses except on potatoes provided that the labels would be altered to only allow machine harvesting of asparagus. That recommendation was based on du Pont representatives' comments that it would be preferable to the Registrant to change the label rather than gather the reentry data for asparagus hand-harvesting. In that case; there would be no hand labor, no reentry exposure, and thus no data required.

The Registrant has now submitted a letter stating that reentry data will be gathered for hand-harvesting of asparagus in California and asking for guidance on study protocols.

10. DISCUSSION:

Subdivision K of the Pesticide Assessment Guidelines contains advice on protocols/methodology for the gathering of reentry data and the use of the data. That should be a Registrant's first source for advice on protocols. Every crop is, to some extent, a special case and protocols must be designed to provide appropriate methodology, sample times, and so forth so that appropriate data will be gathered.

The Registrant has recently submitted a protocol for study of human exposure to Linuron by monitoring fieldworkers during the harvesting of potatoes. A similar approach could be used for the harvesting of asparagus.

11. COMPLETION OF ONE-LINER:

Not applicable

12. CBI APPENDIX:

Not applicable