



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

R.F.

APR 15 1991

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

Memorandum

Subject: Trifluralin. Amended Registration for the Use of  
Gowan Trifluralin 10G (EPA Reg. No. 10163-120) for  
use on Bermudagrass grown for seed. Branch #7668.

From: Jane S. Smith, Chemist *JS*  
Special Registration Section I  
Chemistry Branch II - RS  
Health Effects Division (H-7509C)

Thru: Andrew Rathman, Section Head *AR*  
Chemistry Branch II - RS  
Health Effects Division (H-7509C)

To: J. Miller / S. Robbins PM Team 23  
Herbicide - Fungicide Branch  
Registration Division (H-7505C)

Gowan Company is requesting an amended registration for the use of Gowan Trifluralin 10G (EPA Reg. No. 10163-120) on bermudagrass grown for seed.

Tolerances have been established (40 CFR 180.207) for the herbicide and plant regulator, trifluralin ( $\alpha,\alpha,\alpha$ -trifluoro-2,6-dinitro-N,N-dipropyl-p-toluidine) in/on the following raw agricultural commodities at 0.05 ppm; asparagus, barley, citrus fruits, corn, cottonseed, cucurbits, flax, legumes (forage), fruiting vegetables, nuts, peanuts, peppermint hay, rape, root crop vegetables, safflower seed and pod vegetables, sorghum, spearmint hay, stone fruits, sugarcane, sunflower seed, upland cress, and wheat. Tolerances are also established in/on alfalfa hay at 0.2 ppm, carrots at 1.0 ppm, mung bean sprouts at 2.0 ppm, and peanut hulls at 0.1 ppm.

The amendment request proposes Gowan Trifluralin 10G be applied to established bermudagrass prior to weed emergence at a broadcast rate of 20 lbs/A (2 lbs a.i./A) to control barnyard grass, foxtail, junglerice, sandbur, and cupgrass. The product is activated by overhead sprinkler irrigation or flood irrigation after application. In terms of restrictions to appear on the label, the refuse and seed cleaning of treated bermudagrass being grown for seed cannot be used for pasture, feed, food, forage, or bedding purposes.



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The registrant claims this is not a food use if a restriction prohibiting grazing appears on the label. Bermudagrass grown for seed crops only is considered a food use since seed and seed screenings are used for animal feed. Accordingly crop field trials are required. A label restricting the feeding of treated seed and seed screenings is not practical since the seed and seed screenings ultimately are not under grower control. For future reference, the label should be more specific restricting use on grassland/range/pasture to avoid possible terrestrial feed uses.

No residue data were submitted with this request. No residue data reflecting this proposed use are available.

#### Conclusions and Recommendations

The registrant claims this is not a food use if a restriction prohibiting grazing appears on the label. Bermudagrass grown for seed crops only is considered a food use since seed and seed screenings are used for animal feed. No data were submitted or are available representing the residues of trifluralin occurring as a result of the proposed food use. For these reasons, we recommend against the amended registration.

A 24(c) registration for a state(s) willing to guarantee proper disposal of feed items associated with this type of use would be acceptable. The State of Washington has current regulations that satisfy EPA in this regard.

cc: RF, Circ, S.F., Amend. Use F., PIB/FOD, JSmith.  
RDI:ARathman:04/15/91:EZager:04/15/91  
H-7509C:DEB:JSmith:jss (AU:Fluralin.):Rm810f:CM#2:04/12/91