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Shaughnessy No.: 036101

Date Out of EAB: Jan 4, 1985

To: Dick Mountfort
Product Manager 23
Registration Division (TS-767)

From: Samuel Creeger, Chief 
Review Section #1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

Attached, please find the EAB review of...

Reg./File # : 1471-35, -116, -120, and -143
Chemical Name: Trifluralin
Type Product : Herbicide
Product Name : Treflan
Company Name : Elanco
Purpose : Add new uses to label, as well as other changes. No new
data included with submission.

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|-----------------|-----------------|-----------------------|-----------------|
| Action Code(s): | <u>305</u> | EAB #(s) : | <u>5078-81</u> |
| Date Received: | <u>10/31/84</u> | TAIS Code: | <u>64</u> |
| Date Completed: | <u>1/3/85</u> | Total Reviewing Time: | <u>2.5 days</u> |

Deferrals to: Ecological Effects Branch
 Residue Chemistry Branch
 Toxicology Branch

1.0 INTRODUCTION

Elanco has requested modification of several Treflan labels to increase the rates of application to 2 lb ai/acre. No additional EF data were included with this submission.

2.0 STRUCTURE

See previous reviews.

3.0 DIRECTIONS FOR USE

Labels, as well as proposed changes for each of the following products, are appended to this review:

- o TREFLAN® EC (EPA Reg. No. 1471-35)
- o TREFLAN® MTF (EPA Reg. No. 1471-116)
- o TREFLAN® 5 (EPA Reg. No. 1471-120)
- o TREFLAN® TR-10™ (EPA Reg. No. 1471-143)

4.0 REVIEW OF SUPPORTIVE DATA

Existing EAB data files were reviewed.

An hydrolysis study was submitted/reviewed/found acceptable on 1/17/84.

An accumulation in confined (rotational) crops study was submitted and reviewed on 1/17/84. Recommended label restrictions for the 1 lb ai/acre application were as follows:

- o OK to rotate small grains after 22 weeks, but straw cannot be used for food or feed.
- o OK to rotate corn after 1 year.
- o OK to rotate root crops after 50 weeks (although tops cannot be used for food or feed)
- o OK to rotate tomatoes after 1 year.

Reviews of no other study could be found in the EAB files.

5.0 CONCLUSIONS

EAB cannot concur with the proposed label amendments due to the inadequacy of the treflan data base.

Based on the previously reviewed confined accumulation study, the proposed increase in application rate from 1 to 2 lb ai/acre would probably result in significant increase in both target and rotated crop residues. This, in turn, might lead to additional label restrictions.

6.0 RECOMMENDATION

The registrant should submit data to address all outstanding EF data requirements. Details of requisite data requirements to support of the registration of treflan for the proposed uses (as well as for the proposed label amendments) may be found in the Subpart N guidelines.

On 10/8/81 (review of use on rape seed and straw), EAB noted that the environmental fate of trifluralin had been well documented in the Treflan PD 1-2-3 (8/22/79). The registrant could submit any or all of that data for EAB review, if they wish.

A handwritten signature in dark ink, appearing to read "Emil Regelman", followed by a long horizontal line extending to the right.

Emil Regelman
Chemist
EAB/HED
January 4, 1985