Trifluralin Reg. Std File

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

AUG 6 1992

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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: ID #001812-00328 (CBTS #9501; Barcode #D174759). Trifluralin (Trilin® 10G) on Alfalfa. Label Amendment. (No MRID #).

FROM: Nancy Dodd, Chemist Nancy Dodd
Tolerance Petition Section II
Chemistry Branch I- Tolerance Support
Health Effects Division (H7509C)

THRU: Debra Edwards, Ph.D., Acting Chief Debra Edwards
Chemistry Branch I- Tolerance Support
Health Effects Division (H7509C)

TO: Joanne Miller, PM #23
Fungicide-Herbicide Branch
Registration Division (H7505C)

Introduction

RD has requested that CBTS review the label for Trilin 10G (trifluralin, produced by the Griffin Corporation) on alfalfa to determine whether there is a tolerance concern regarding directions allowing a second application. RD asks whether the wording "For extended weed control, a second treatment of 20 pounds per acre may be applied after at least two cutting cycles or 60 days of active alfalfa growth" will exceed the maximum allowable tolerance level. RD has not found directions for a second treatment on any other trifluralin labels.

Tolerances are established for trifluralin on alfalfa hay at 0.2 ppm (40 CFR 180.207).

No tolerances are established for trifluralin on animal commodities.

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Conclusions

1. Residue data reflecting the proposed use are needed on alfalfa hay and alfalfa meal. Residue data and a tolerance proposal are also needed on alfalfa forage unless a feeding/grazing restriction is added to the label. Residue data and a tolerance proposal on alfalfa seed are not needed unless the alfalfa is grown for seed. Whether the use could include alfalfa grown for seed should be clarified on the label. The residue data must be supported by submitted/referenced storage stability data.

2. Residue data reflecting both ground and aerial applications are needed or the label should be revised to restrict applications to ground applications only.

3. No tolerances have been established for trifluralin on animal commodities. Depending on residue levels in alfalfa, enforcement methods for animal commodities, animal feeding studies, and tolerances for animal commodities may be needed.

Recommendations

The Trilin 10G label on alfalfa is not supported by available residue data. The petitioner should submit or reference the data requested in Conclusions 1, 2, and 3 above. Depending upon the residue levels and proposed use, a tolerance petition reflecting a higher proposed tolerance on alfalfa hay and proposed tolerances on alfalfa forage, alfalfa meal, alfalfa seed and animal commodities may be required.

Although not required, CBTS recommends that a protocol be submitted before residue studies are started.

Note to PM: A copy of this entire review should be sent to the petitioner.

DETAILED CONSIDERATIONS

Proposed Use

Established Alfalfa

Apply Trilin 10G to alfalfa "during dormancy or throughout the growing season immediately after cutting". Apply at a broadcast rate of 15 lb/A (1.5 lb ai/A) on coarse soils and 20 lbs/A (2.0 lb ai/A) on medium and fine soils in areas receiving less than 20 inches average annual rainfall. A second treatment may be applied after at least two cutting cycles or 60 days of active alfalfa growth. Trilin 10G may be applied by ground or air. If a rainfall or overhead sprinkler irrigation of 0.5 inches does not occur within three days after application, Trilin 10G should be incorporated into the soil. Do not apply within 21 days of

harvest. Do not use Trilin 10G on soils containing 10% or more organic matter.

To control dodder, apply Trilin 10G at the rate of 20 lbs/A (2.0 lb ai/A) in late dormancy as new growth resumes. A second application may be made after at least two normal cutting cycles or 60 days of active alfalfa growth.

Do not make more that 2 applications of Trilin 10G to alfalfa within a 12 month period.

Residue Data

No residue data were submitted/referenced with this Trilin 10G label.

A 24(c) request for use of another granular formulation (Treflan TR-10, an Elanco product) on alfalfa, which involved a second application after at least two cutting cycles or 60 days of active alfalfa growth, was recommended against (M. Metzger, 7/31/87). The application rate was 2 lb ai/A. The reviewer required additional residue data.

The Residue Chemistry Chapter of the Trifluralin Registration Standard (7/12/85) indicated that registered application rates for granular and EC formulations on alfalfa were 0.75-1 lb ai/A. Additional residue data were requested.

The Trifluralin Product and Residue Chemistry Reregistration Standard Updates (10/29/91) indicated that a 10G formulation of Dow Elanco (EPA Reg. No. 62719-131) is registered for soil application to established alfalfa at 2 lb ai/A for all soil types. Additional residue data were requested.

No tolerances have been established for trifluralin on alfalfa forage. (According to Table II of the "Pesticide Assessment Guidelines, Subdivision O, Residue Chemistry", alfalfa forage is under grower control.)

Alfalfa seed is considered an RAC only for alfalfa grown for seed.

Alfalfa meal (dried and ground up hay) is a processed commodity. Residue data on alfalfa meal are needed to determine whether a feed additive tolerance is needed.

Based on a memo dated 12/6/91 from Robert Quick, Acting Chief, Chemistry Branch I and Edward Zager, Chief, Chemistry Branch II, CBTS and CBRS have changed the data requirements concerning aerial applications for residue data as follows:

"Provided that the pesticide product label specifies that aerial applications are to be made in a minimum of 2 gallons water per acre (or 10 gallons per acre in the case of tree crops), crop field trials reflecting aerial applications will no longer be required in those cases where adequate data are available from use of ground equipment reflecting the same application rate, number of applications, and preharvest interval. This data waiver does not apply to aerial applications using diluents other than water (e.g., vegetable oils). In addition, we do reserve the right to require aerial data if special circumstances warrant it."

"This change in our data requirements is to be implemented immediately for all types of actions- tolerance petitions, amended registrations, reregistration reviews, etc."

However, since the formulation Trilin 10G is a granular formulation which is not mixed in water, this policy does not apply. Therefore, residue data reflecting both ground and aerial applications are needed or the label should be revised to restrict applications to ground applications only.

CBTS concludes that residue data reflecting the proposed use are needed on alfalfa hay and alfalfa meal. Residue data and a tolerance proposal are also needed on alfalfa forage unless a feeding/grazing restriction is added to the label. Residue data and a tolerance proposal on alfalfa seed are not needed unless the alfalfa is grown for seed. Whether the use could include alfalfa grown for seed should be clarified on the label. The residue data must be supported by submitted/referenced storage stability data.

CBTS concludes that residue data reflecting both ground and aerial applications are needed or the label should be revised to restrict applications to ground applications only.

CBTS concludes that, depending on residue levels in alfalfa, enforcement methods for animal commodities, animal feeding studies, and tolerances for animal commodities may be needed.

cc: RF, SF, Circu (7), N.Dodd (CBTS), E. Haeberer (CBTS), Trifluralin Reg. Std. File

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