

Shaughnessy Number: 80807

Date Out of EFGWB: 1/10/90

TO: Phillip Poli
Product Manager 67
Registration Division (H7505C)

FROM: Michael Barrett, Acting Section Head
Ground-Water Technology Section
Environmental Fate & Ground-Water Branch EFED (H7507C)

THRU: Henry Jacoby, Chief
Environmental Fate & Ground-Water Branch/EFED (H7507C)

Attached, please find the EFGWB review of:

Reg./File #: 256590 (record no.)

Chemical Name: simazine

Type Product: herbicide

Company Name: Ciba-Geigy Corp.

Purpose: Request for time extension and reduction in data re-
quirements for the simazine use and monitoring data called in.

Date Received: 1/3/90 ACTION CODE: 870

Date Completed: 1/10/90 EFGWB #(s): 90-0224

Monitoring study requested: Total Review Time: 0.5d

Monitoring study voluntarily:

Deferrals To: Biological Effects Branch
 Science Integration & Policy Staff, EFED
 Non-Dietary Exposure Branch, HED
 Dietary Exposure Branch, HED
 Toxicology Branch, HED

**EFGWB Response to 12/7/89 Letter from Ciba-Geigy Corp. Concerning 90-Day Response
Simazine Special Data Call-In**

The Environmental Fate & Ground Water Branch believes that it is acceptable to grant the registrant extensions on data submissions under certain conditions. EFGWB has records indicating that submission of a reduced data set defining simazine use in the United States was proposed by Ciba-Geigy in a September 28, 1989 meeting with Office of Pesticide Programs personnel. Although an EFGWB representative agreed that providing the data as originally requested would be quite difficult, no comments have been forwarded to Ciba-Geigy Corp. on the acceptability of the revised data reporting form that they proposed. EFGWB will be consulting with Benefits and Economic Analysis Division concerning what level of detail is likely to be feasible. A possible compromise use data submission format follows:

1. Provide total use data by county for the states of FL and CA. For these states, use data must be sorted by crop/site for any crop/site that represents 10% or more of the total use in the county.
2. For all states, provide use information sorted by aquatic and non-aquatic use.
3. Discuss trends in simazine use (change in total pounds sold and in important crops by state or at least by geographic region) over the last 10 years.
4. For the 10 states with the highest volume of use, determine the 10 counties with the highest volume of use and provide some measure of use in each of these counties. If the registrant believes that obtaining actual use information for counties in these states involves an unreasonable amount of effort and the Agency agrees, then use of sales information from agricultural chemical dealers as a surrogate for use will be considered. If sales information is not available for recent years, then the Agency will consider granting an extension to the registrant to sometime in the Fall of 1990 to allow the registrant time to collect sales data for the relevant counties for 1990. Interview with county extension agents and other knowledgeable persons should be conducted in each of these counties to determine what the major use sites are in each county.

Please note that the above suggestions are still subject to change, EFGWB will make
forma recommendations within the next 2 weeks.

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