

JUL 7 1987

**MEMORANDUM**

**SUBJECT:** Ecological Effects Branch response to Ciba-Geigy letter regarding Simazine registration

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**THRU:** Raymond W. Matheny  
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**THRU:** Michael W. Slimak, Chief  
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**TO:** Richard F. Mountfort, PM 23  
Fungicide-Herbicide Branch  
Registration Division (TS-769c)

The Ecological Effects Branch (EEB) has reviewed the Ciba-Geigy Corporation response to a requirement for field residue monitoring to support reregistration of the herbicide Simazine. Residue monitoring data was requested because avian reproduction studies indicated potential chronic reproductive effects at dose levels above 100 ppm. The registrant indicates that hazard to birds will be mitigated by dropping maximum label rates from 40 lbs a.i. per acre to 18 lbs a.i. per acre. The registrant also notes that noncropland settings where simazine is used are not bird habitats.

On the basis of available scientific data, EEB is unable to withdraw the requirement for a field residue monitoring study. At an application rate of 18 lbs a.i. per acre, expected residues on short range grass immediately following application of Simazine would be in excess of 4000 ppm. Although residues may decline in sufficient time to make long-term effects unlikely, this cannot be concluded until the results of a residue monitoring study, as described in the previous EEB review, are received. EEB ~~does not~~ <sup>cannot</sup> accept the registrant's

SYMBOL	assertion that noncropland is not bird habitat.				
SURNAME	Armitage	Matheny	Slimak		
DATE	7-6-87	7-6-87	7/6/87		

EEB has reviewed the registrant's request that submitted end use product toxicity tests using rainbow trout be accepted because no known solvent can eliminate precipitation. EEB cannot concur. If precipitation cannot be eliminated, measured concentrations of Simazine in each dose level must be reported. The registrant notes that a static renewal study with supporting analytical data may fully define the LC<sub>50</sub> value. The results of such testing may fulfill the data requirement.

## CONCURRENCES

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