



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

MEMORANDUM **ALG 11 1982**

TO: William Burnam, Deputy Chief
Toxicology Branch

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

THRU: Laurence D. Chitlik, Section Head
Toxicology Branch

SUBJECT: Issues concerning glyphosate (Roundup®) tolerances on
or around aquatic sites
PP#9F2163; PP#9H5204; EPA Reg.#524-308 CASWELL#661A

On June 27, 1978 a Tox Branch (TB) memo was written which with a review from Residue Chemistry Branch formed the basis for hazard assessment of the contaminant N-nitrosoglyphosate (NNG) found in technical and formulated Roundup®. After reviewing this assessment Mr. Johnson gave permission to proceed with establishing several tolerances for glyphosate (Taylor memo of 9/5/78, attached). However, the TB data base for glyphosate at that time contained IBT studies which have since been declared invalid (e.g. see attached memo). Other IBT studies that were validated, now need to be evaluated before they can be used to support tolerances. Furthermore, just recently it has been learned that there are additional toxicological studies with NNG which have not been considered. They are:

- 1) IBT#8560-8924 - 2-year oral - rat
- 2) IBT#8580-8922 - 2-year oral - dog
- 3) IBT#8533-08923 - 3-generation reproduction - rat
- 4) An oncogenic study in mice to be submitted by the registrant in the first quarter of 1983.

Toxicology Branch has two possible options at this time:

1. Proceed with approval of pending glyphosate tolerances on or around aquatic sites, including a level of 0.5 ppm in potable water (and the resultant residue of NNG, which has been shown to be < 2 ppb when moving waters are treated with glyphosate [RCB memo of 11/23/81 on PP#9F2163/FAP 9H5204]).

2. Delay approval of pending glyphosate tolerances on or around aquatic sites until all data, including that recently made available and soon to be completed have been thoroughly reviewed.

It is suggested that such a determination be made at the Branch level. Please indicate the course of action you wish to follow and forward this to Bob Taylor in the Registration Division.

Attachments

Winnie Teeters
Winnie Teeters, Pharmacologist
Toxicology Branch

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