

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OK OK

DATE: 7/18/78
 SUBJECT: Roundup^R, 524-EUP-46, and temporary tolerances for glyphosate and metabolite (aminomethylphosphonic acid) at 0.4 ppm on forest legumes and at 0.1 ppm each on liver and kidney of cattle, goats, hogs, horses, poultry and sheep, human safety evaluation of.
 FROM: TB/RD (now HEW)
 TO: Ms. Libby Zink
 Special Registration Section
 PP No. 8G2080
 Monsanto, St. Louis, Mo.

CONCLUSION:

Based on available TOX data on Roundup^R; its active ingredient, glyphosate; and nitrosoglyphosate in our files, we can find "safe" to humans Petitioner's proposed experimental program and temporary tolerances (memo title, above). This conclusion is contingent, however, on receipt by this reviewer of a corrected, up-to-date statement of confidential formulation of Roundup, EPA No. 524-308.

This is needed because the jacket for 524-308 contains letter to Mr. R. J. Taylor (PM) from Dow Chemical, 1/5/78, to the effect that a constituent of the formulation which the Company supplies is changed both with respect to name and composition. The 524-308 jacket does not contain a corrected "statement of formula" to show these changes. (We noted this in our response to 524-EUP-44 and asked (11/13/78) for a new actual formulation - not received yet.)

BRIEF NOTE AS TO NATURE OF THE REQUESTED EUP:

Proposal is to use 1,310 gallons of formulation (3930 lbs active ingredient) on 2620 acres of forage grasses and legumes (e.g., birdsfoot trefoil, alfalfa, red clover, and white clover) over a 2-yr period. Control of annual or perennial weeds present is sought. Roundup will be either applied to weeds and the field tilled or to weeds either broadcast or banded at time of or before no-till planting. Rates will vary from 0.25 to 6 quarts formulation per acre. Label warnings against planting certain crops for one year and grazing or feeding cover crops for 8 weeks are included. The EUP is set up to determine: (a) Evaluation of various ways of planting; (b) Evaluation of the effects of Roundup on the many species of grasses and legumes; and (c) Evaluation overall regions of the U.S. in a 2-yr period.

Mary L. Quaife, Ph.D., HED/OPP

MLG
 7/18/78

N.B. 7/19/78 An up-to-date formulation of 524-308 Roundup is at hand (in M. Quaife files on glyphosate). Therefore, TB recommends for both tolerances (memo title) and for EUP (524-EUP-44)

MLG 7/18/78

10/25/78

The CB memo of September 29, 1978 corroborates the tolerances proposed by the petitioner, thus the TOX Branch review by Dr. Quaife (7/18/78) is valid in its conclusion.

Reto Engler, Ph.D.

Reto Engler 10/25/78