



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

MAY 13 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Pendimethalin Reregistration. Confined rotational crop study.

CBRS No.: 16908

DP Barcode No.: D223184

MRID No.: 43918601

Chemical No.: 108501

Reregistration Case No.: 0187

Bonnie Cropp-Kohlligian

FROM: Bonnie Cropp-Kohlligian, Environmental Scientist
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THRU: Susan V. Hummel, Acting Section Head
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TO: Walter Waldrop/Jane Mitchell [PM-71]
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and

Paula Deschamp, Section Head
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American Cyanamid Company has submitted a confined rotational crop study (MRID 43918601). These data were received after CBRS completed the Residue Chemistry Chapter for the Pendimethalin Reregistration Eligibility Decision (RED) document (12/12/95). CBRS has



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considered these data and has determined that an increase of the dietary exposure estimates used in the most recent pendimethalin dietary risk assessment (2/21/96) is not indicated.

The data, as presented by the registrant, indicate that total radioactive residues (TRR) in/on representative crop matrices (mature wheat straw, wheat grain, lettuce plants, radish tops, and radish roots) will exceed 0.01 ppm when planted 90 and/or 270 days after the treatment (DAT) of soil with radiolabelled pendimethalin at a nominal rate of 2.0 lb ai/A (ca. 1x the currently registered maximum application rate of pendimethalin to food/feed crops which may be rotated excluding crops grown for seed) and that these radioactive residues in/on rotated crops will be extensively metabolized. Furthermore, the registrant has indicated that only radioactive residues of pendimethalin *per se* exceeded 0.01 ppm in/on any of the mature raw agricultural commodities (RAC) studied and that radioactive residues of pendimethalin *per se* were below 0.01 ppm in/on lettuce plants, radish tops, and radish roots at 270 DAT and in/on wheat straw and grain at 90 DAT.

Unless the registrant wishes to impose plantback intervals of 90-days for rotated cereal grain crops and 270-days for all other rotated crops, limited field rotation crop studies (Guideline 165-2) are required in order to determine if tolerances for residues of pendimethalin in/on rotational crops are needed.

cc: BLCKohlligian (CBRS), RF, Pendimethalin Reg. Std. File, Pendimethalin SF, Circulate.

RDI: SHummel:5/7/96 RPerfetti:5/9/96 EZager:5/13/96

7509C:CBRS:BLCKohlligian:CM#2:Rm 805B:703-305-7462:5/8/96.