



2-24-84

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

FEB 24 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 214-243. Amended registration for PROWL® (pendimethalin) on potatoes.

FROM: Linda S. Propst, Chemist *Linda S. Propst*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769) *CT*

TO: Robert J. Taylor, Product Manager #25
Fungicide-Herbicide Branch
Registration Division (TS-767)

American Cyanamid Company has previously requested an amended registration for the herbicide PROWL® to add postemergence incorporation up to the 6-inch stage of growth alone or in tank mix combination with metribuzin and with Eptam on potatoes.

In response to deficiencies cited in our memo of 7/8/83, L.S. Propst, the registrant has submitted a letter intended to clarify a "misunderstanding by the reviewer on how PROWL® was to be applied and incorporated." The letter explains that PROWL® was sprayed over the potato plants and incorporation was by rain or sprinkler irrigation, and not by mechanical incorporation.

The reviewer had no concerns about the method used for incorporating the pendimethalin into the soil but rather the time at which the herbicide was applied. The request was to allow 1.5 lbs. active/acre to be applied post-emergence up to a 6-inch stage of growth.

We reiterate, none of the data available in our files reflect residues of pendimethalin occurring on potatoes from postemergence incorporation up to a 6-inch stage of growth using the maximum recommended application rate of 1.5 lb. active/A.

1

CONCLUSIONS AND RECOMMENDATIONS

In the absence of data which reflect postemergence incorporation up to the 6-inch stage of growth using the maximum recommended application rate of 1.5 lb. active/acre, we are unable to conclude that the tolerance of 0.1 ppm established to cover residues of pendimethalin in or on potatoes will not be exceeded.

For this reason we recommend against the proposed amended registration. A favorable recommendation is contingent upon the registrant submitting residue data which reflects postemergence incorporation of pendimethalin up to the 6-inch stage of growth of potatoes using the maximum application rate of 1.5 lb. active/acre.

cc: Reading File
Circulation
Reviewer
Subject File
Amended Use File

TS-769: RCB:L.S.Propst:LSP:CM#2:Rm 810:X77324: 2/23/84
RDI: A.R.Rathman, 2/22/84; R.D.Schmitt, 2/23/84

2
26