



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

R.F.

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

JUL 24 1991

MEMORANDUM

SUBJECT: American Cyanamide Company: Response to the  
Pendimethalin Reregistration Standard: Residue  
Chemistry Requirements (No MRID #; CBRS # 8118;  
Barcode: D165134).

FROM: E. Zager, Chief *Edward Zager*  
Chemistry Branch II: Reregistration Support  
Health Effects Division (H7509C)

TO: Lois Rossi, Chief  
Reregistration Branch  
Special Review & Reregistration Division (H7508C)

and

Reto Engler, Ph.D., Chief  
Science Analysis and Coordination Branch  
Health Effects Division (H7509C)

American Cyanamide has responded to our review of 1/29/91 regarding remaining residue chemistry requirements. While the both Branches feel that it is unfortunate that the Registrant misinterpreted our conclusions regarding certain Residue Chemistry data requirement policies, however the point is moot since the Registrant has agreed to perform all of the remaining studies.

With respect to the Registrants request for time extensions, the Branch has no objections to delaying the required processing studies until the nature of the residue in plants is adequately understood. The granting of time extensions is, of course, the decision of RB/SRRD.

If you need additional input please advise.

cc: RBP, Pendimethalin Reregistration Standard file,  
Pendimethalin Subject File, C. Furlow/J. Burrell (PIB/FOD) and RF  
and Circ..