

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

6-26-80

DATE: 26 JUN 1980

SUBJECT: Prowl

FROM: Fisheries Biologist, Section 4, Ecological Effects Branch (TS-769)

TO: Robert J. Taylor, PM, Team 25
Herbicides - Fungicides Branch (TS-767)THRU: Henry Craven, Head, Section 4 *for HRC*THRU: Clayton Bushong, Chief *CB*
Ecological Effects Branch, Hazard Evaluation Division

The American Cyanamid Company is presently seeking new uses for Prowl Herbicide (Registration No. 241-243) on Tobacco and Sorghum. The Ecological Effects Branch has expressed its concerns over these uses in its Reviews (5/13/80, 5/15/80) and in a meeting with RD (6/3/80). After careful reconsideration and much deliberation, EEB has determined that the requested non-target toxicity tests are still required prior to its completing a hazard assessment. The field monitoring study requested in the EEB review for the tobacco use would provide valuable information in support of not only the tobacco use but also for all currently registered uses (corn, soybeans, cotton) and possible future uses (sorghum, etc.). Therefore, the field monitoring study to determine the concentrations of the Prowl active ingredient in the groundwater and receiving aquifers in its agricultural use area should be a FIFRA Section 3(c)(2)(B) request for currently registered uses. Also, results of the field monitoring study are required by EEB prior to its completing a hazard assessment for the two proposed uses.

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