

EFFICACY REVIEW

DATE: IN 1/28/80 OUT 1/30/80

FILE OR REG. NO. 100-597

PETITION OR (EXP. PERMIT NO.) _____

DATE DIV. RECEIVED 1/21/80

DATE OF SUBMISSION 1/11/80

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): I, D,(H),F, N, R, S Herbicide

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. 23 Garner

PRODUCT NAME(S) Dual 8E

COMPANY NAME Ciba-Geigy Corporation

SUBMISSION PURPOSE Label review - addition of Atritol 80W or Princep

80W plus Dual 8E tank mixes for railroad rights-of-way

CHEMICAL & FORMULATION Metolachlor: 2-chloro-N-(2-ethyl-6-methylphenyl)-

N-(2-methoxy-1-methylethyl)

acetamide 8lbs ai/gal 86.4%

200.0 Introduction

Ciba-Geigy Corporation is requesting amended registration of Dual 8E allowing its use in a tank mix with Atratul 80W or Princep 80W for weed control on railroad rights of way (submission of January 11, 1980). Dual 8E (EPA Reg. No. 100-597) is currently registered for weed control in corn grown for grain. Dual is registered for ground application only. Both Atratul 80W (EPA Reg. No. 100-503) and Princep 80W (EPA Reg. No. 100-437) are registered for the same application sites as the new tank mixtures recommendation. Proposed dosages in the tank mix with Atratul 80W or Princep 80W are within currently registered dosages of each product. On the registered label of Dual 8E the recommended dosage rate is between 1.25 and 3.0 pts. per acre, however, the proposed label recommends 4.0 pts. per acre for effective residual weed control. EPA staff discussed with Ciba-Geigy representative Jack Norton this increase in Dual 8E dosage rate, Ciba-Geigy agreed to comply with the maximum dosage rate of 3.0 pts. recommended on the registered label of Dual 8E instead of 4 pts.

201.0 Data Summary

No data was submitted.

202.0 Label comments

1. Under the directions for use section, it should be indicated if aerial or ground equipment is intended for application. If aerial application is intended, appropriate use directions and drift precautions must be added. If aerial application is not intended, add the label statement "Do not apply through aerial application equipment."
2. On the label the following must be added: the sequence of adding each product to the tank mix, indicate the total spray volume per acre, and whether agitation of the tank mix is necessary to keep the proposed products in suspension.
3. Tank mix compatibility data at maximum rates in minimum spray volumes must be submitted for each tank mix. Reports should include variables such as water temperature, pH and hardness as well as resuspendibility and sprayability through commercial equipment at normal operating pressure.
4. Since both Atratul 80W and Princep 80W registered labels state moisture or rainfall is required to move Atratul^{80W} or Princep 80W into the weed root zone the statement "Very dry soil conditions and lack of sufficient rainfall may result in poor weed control" should be added to the proposed label.

5. If more than one application per growing season is required for weed control then the number of applications, time interval between each, and the amount of dosage rate for each must be indicated on the label.
6. It must be understood that the use of terms such as pigweed, crabgrass, and ragweed in claiming weed control implies that the product controls each species within that family. If in fact this is not the intent of such terms then the label weed claims must be made more specific to identify each weed species.
7. On the proposed label, change the recommended dosage rate from 4 pts. to 3 pts. of Dual 8E in order to comply with the maximum dosage rate allowed on the current registered label.
8. Dosage rates as indicated in proposed labeling are confusing. It is recommended that ^{a rate such as 3.0} ~~the~~ following ~~rate~~ should be used instead of the proposed statements and footnotes.

Herbicide(s)	Rate/A
Dual 8E	3.0 pts
+	+
Atraton 80W	6.0-12.5 lbs
Dual 8E	3.0 pts
+	+
Princep 80W	6.0-12.5 lbs
Dual 8E	3.0 pts
+	+
Princep 4L	9.6-20.0 lbs
Dual 8E	3.0 pts
+	+
Caliber 90	5.4-11.25 lbs

9. Since Princep 80W alone controls the same weeds as Dual 8E alone, there seems to be no advantage to the tank mix. If Princep 80W alone is not providing adequate control of these species then the Princep 80W claims must be modified. If there is no advantage to this tank mix, it should be deleted.
10. On the Atraton 80W registered label it is implied that Atraton is a nonselective herbicide and hence may control the same weeds as Dual 8E. If this is true, then you must explain the benefits of the proposed tank mix. If there is no advantage to this tank mix, it should be deleted.

204.0 Recommendation

Label amendment of Dual 8E (EPA Reg. No. 100-597) submitted on January 11, 1980 will be accepted after complying with the above label comments (203.0).

Jane Talarico
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TSS, FHB
January 29, 1980
E 3/5/80

Note to PM:

1. Aerial application of Dual 8E + Atraton 80W tank mix and Dual 8E + Princep 80W should be reviewed by Dr. Robert Holst (HED, EEB) for hazards to nontarget species.