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

SEP 12 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 7969-58. Poast® (sethoxydim) on sugarbeets. Revised labelling. Accession No. 259030. RCB No. 1372.

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

THRU: Andrew R. Rathman, Section Head
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Robert Taylor, PM 25
Fungicide-Herbicide Branch
Registration Division (TS-767)

The Agricultural Chemicals Group, BASF Wyandotte Corporation has submitted supplemental amended labelling for the use of Poast® Herbicide to control annual and perennial grasses in sugarbeets. This revised labelling restricts the feeding of sugarbeet tops.

Tolerances have been established for the combined residues of the herbicide 2-[1-(ethoxyimino)butyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexene-1-one and its metabolites containing the 2-cyclohexene-1-one moiety (calculated as the herbicide) in or on sugarbeet roots at 0.1 ppm and in or on sugarbeet tops at 0.2 ppm. In addition, a feed additive tolerance of 0.5 ppm has been established for sugarbeet molasses (40 CFR 180.412).

The currently registered use for Poast® on sugarbeets in states other than California, Arizona, and New Mexico allows for applications at rates of 1-2 pints (0.2-0.4 lb. a.i.)/A. In California, Arizona, and New Mexico rates of up to 2 1/2 pts (0.5 lbs. a.i.)/A may be needed. No more than five pints of Poast® are to be applied per season.

The registrant has submitted data from three side-by-side studies comparing residue levels on sugarbeet roots and tops resulting from ground applications versus residue levels resulting from aerial applications. All three trials received two applications using 0.5 lbs. a.i./A. Whether applied by air or ground equipment, total residues in all sugarbeet roots were <0.1 ppm.

Total residues of Poast® resulting in or on sugarbeet tops from either ground or aerial applications exceeded the established tolerance of 0.2 ppm. Maximum total residues detected in sugarbeet tops were 1.75 ppm from the ground applications and 0.71 ppm from the aerial applications.

To avoid illegal residues which exceed the established tolerance of 0.2 ppm in or on sugarbeet tops, the registrant proposes restricting the feeding of sugarbeet tops until additional residue data can be generated to determine whether or not it is necessary to petition for a higher tolerance on sugarbeet roots.

CONCLUSIONS AND RECOMMENDATIONS

We have no objections to the registrant restricting the feeding of sugarbeet tops until such time as additional residue data can be generated to determine whether a higher tolerance level to cover all residues of Poast® resulting on sugarbeet tops from the currently registered use will be necessary.

Note to PM: Since overtolerance residues on sugarbeet tops would occur from the currently registered use, and other Poast® labels containing directions for use on sugarbeets should also be revised to include a restriction against the feeding of sugarbeet tops.

cc: Reading File, Amended Use File, Subject File, Circulation, Reviewer, PMSD/ISB
RDI: A. R. Rathman, 9/11/85; R. D. Schmitt, 9/12/85
TS-769:L.S.Propst:lsp:557-7324:CM#2:Rm810:9/11/85

2