

FILE COPY

Shaughnessy No.: \_\_\_\_\_

Date Out of EAB: 28 OCT 1983

To: Robert Taylor  
Product Manager 25  
Registration Division (TS-767)

From: Richard V. Moraski, Head (acting)  
Review Section 1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769c)

*R. Moraski*

Attached please find the EFB review of...

Reg./File No.: 352-EUP-RRR

Chemical: DPX-T6376

Type Product: Herbicide

Product Name: -

Company Name: DuPont

Submission Purpose: Confirmation of meeting agreement.

ZBB Code: other

ACTION CODE: 711

Date In: 8/11/83

EFB # 3482

Date Completed: 10/28/83

TAIS (level II)

Days

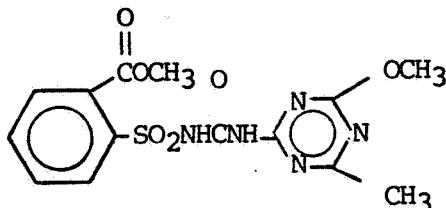
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## 1.0 INTRODUCTION

The registrant, DuPont, has responded to the pre-EUP conference of 6/8/83, at which certain data gaps were identified. The registrant has requested an EUP to apply the herbicide DPX-T6376 to fallow land.

## 2.0 STRUCTURE



Chemical Name: Methyl 2-[[[[(4-methoxy,6-methyltriazin-2-yl)amino]carbonyl]amino]sulfonyl]benzoate

## 3.0 DIRECTIONS FOR USE

See review of 5/20/83.

## 4.0 DISCUSSION

A copy of DuPont's July 8, 1983 response is appended to this review. Briefly, the registrant has agreed to...

- a two year rotational interval, except for barley.
- provide the fish bioaccumulation study within 6 month of the EUP approval date.
- to provide an hydrolysis study for the triazine amine moiety within three months of the EUP approval date.
- to provide soil metabolism and dissipation data for the triazine amine moiety (copies included with this submission).
- to withdraw without prejudice study AMR-8982.

## 5.0 CONCLUSION

The terms cited in 4.0 above are consistent with those agreed to in the specified meeting.

## 6.0 RECOMMENDATION

Accession #250928 should be resubmitted for review with the next data package on DPX-T6376.

Emil Regelman  
Chemist  
EAB/HED (TS-769c)  
October 27, 1983



ESTABLISHED 1802

E. I. DU PONT DE NEMOURS & COMPANY

INCORPORATED

WILMINGTON, DELAWARE 19898

LEGAL DEPARTMENT

July 8, 1983

Mr. Robert J. Taylor  
Product Manager (25)  
Fungicide-Herbicide Branch  
Registration Division (TS-767C)  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Mr. Taylor:

SUBJECT: Du Pont DPX-T6376 DF Weed Killer  
EPA File Symbol 352-EUP-RRR  
Pesticide Petition No. 3G2834  
Letter R.J. Taylor to J.J. Trexel dated May 27, 1983  
Letter R.J. Taylor to J.J. Trexel dated June 24, 1983

In letters dated May 27 and June 24, 1983, you identified several apparent deficiencies relative to data submitted in support of Du Pont's request for temporary tolerances and application for EUP for DPX-T6376 as referenced above. On June 8, 1983, Du Pont representatives R.L. Fisher, B.G. Julin, and P.W. Schneider, Jr. met with EPA representatives C. Fletcher, J. Remmers, and E. Rigglesman to discuss those questions raised in the May 27 letter. Based on agreements reached during that meeting and in compliance with your letters referenced above, Du Pont herewith provides the information required by EPA for favorable action on the subject EUP and temporary tolerances.

The following comments address those deficiencies expressed in your letter dated May 27, 1983:

1. Crops in rotation - In accordance with your letter, the proposed EUP label has been amended to specify that the minimum crop rotation waiting period for all crops other than wheat or barley is two years. The amended labeling is attached as Appendix 1 (021183, 070683).
2. Fish accumulation study - Per our agreement with EPA officials during the June 8 meeting, Du Pont will submit a DPX-T6376 fish accumulation study within six months of the EUP approval date. As additional resource data relative to the bioaccumulation potential of DPX-T6376, fish bioaccumulation studies conducted with the similar Du Pont

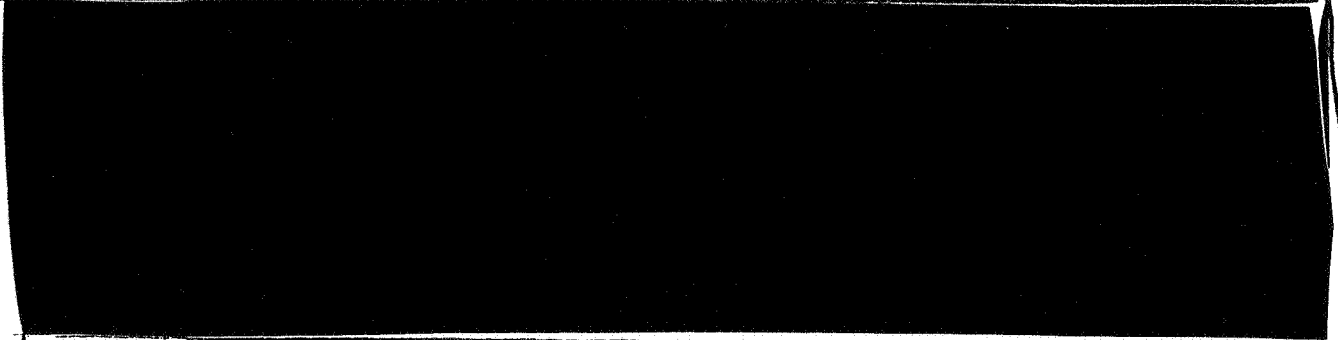
sulfonylurea compounds DPX-T5648 (Oust® Weed Killer, sulfometuron methyl, EPA Reg. No. 352-401) and DPX-4189 (Glean® Weed Killer, chlorsulfuron, EPA Reg. No. 352-404) are attached as Appendices 2 and 3, respectively. These studies were submitted to EPA on 6/15/82 and 11/13/81 in connection with 352-EUP-108 (DPX-T5648) and Pesticide Petition 2F2604 (DPX-4189), respectively.

### 3. Environmental fate studies

- a. Hydrolysis - Per our agreement with EPA officials during the June 8 meeting, Du Pont will submit a hydrolysis study on triazine amine within three months of the EUP approval date.
  - b. Aerobic soil metabolism - The triazine moiety liberated from DPX-T6376 is identical to that liberated from DPX-4189 (identified under 2 above). Hence, under conditions of aerobic soil metabolism, the fate of the triazine fragment will be the same whether contributed by DPX-T6376 or DPX-4189. Chemical, biological, and toxicological data on DPX-4189 are in EPA records under Reg. No. 352-404 and are fully described in the chlorsulfuron Registration Standard. Specifically, Du Pont documents AMR-32-81 (Microbial Degradation of <sup>14</sup>C-DPX-4189 in Soil) and AMR 54-81 (<sup>14</sup>C-DPX-W4189 Soil Dissappearance Studies in the Field) describe the fate of the triazine moiety under laboratory and field conditions, respectively. These data are directly applicable to DPX-T6376 and are included as Appendices 4 and 5 in fulfillment of the requirement for a description of the fate of the triazine fragment under conditions of aerobic soil metabolism.
  - c. Aerobic soil dissipation - The subject study (<sup>14</sup>C-DPX-T6376 Aerobic Soil Dissipation Study in the Greenhouse; Du Pont Document No. AMR 89-82; Appendix G-3 of Pesticide Petition No. 3G2834) is a preliminary investigation of soil dissipation characteristics under greenhouse conditions. The biometer study (Aerobic Soil Metabolism of <sup>14</sup>C-Phenyl-Labeled-DPX-T6376; Du Pont Document No. AMR 75-82; Appendix G-2 of Pesticide Petition No. 3G2834) is a more definitive investigation of aerobic soil dissipation conducted under controlled conditions in the laboratory. Since the biometer study (AMR 75-82) provides all of the data required for characterization of aerobic soil dissipation, Du Pont requests that the report entitled "Aerobic Soil Dissipation Study in the Greenhouse" (AMR 89-82, Appendix G-3 of Pesticide Petition No. 3G2834) be withdrawn without prejudice.
- 4

INERT INGREDIENT INFORMATION IS NOT INCLUDED

The comments below pertain to the deficiency noted in your letter dated June 24, 1983.



If any questions arise concerning these data, we would appreciate that Mr. Trexel be advised by phone (collect) at (302) 774-6403.

This submission contains confidential Du Pont information and protection from public disclosure is claimed to the extent permitted by Section 301(j) of the Federal Food, Drug, and Cosmetic Act, Section 10 of the Federal Insecticide, Fungicide and Rodenticide Act as amended, and Section 552(b)(3) and (4) of the Freedom of Information Act, 4 U.S.C. 552.

Respectfully submitted,  
E.I. du Pont de Nemours and Company

by:

James J. Trexel  
James J. Trexel

JJT/byc