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

DEC 11 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#4F3128 Command Reply to Tox Deferral Concerning Increase
in Level of One Manufacturing Impurity. No Accession Number.
RCB #1414

FROM: Lynn M. Bradley, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

Lynn M. Bradley

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

RCB

and

TO R. Taylor, PM 25
Fungicides-Herbicides Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

Toxicology Branch has deferred to RCB to verify the quantity and significance of one impurity in FMC's Command herbicide (memo of C. Gregorio to R. Taylor 8/20/85). RCB's review of 9/24/85 (J. Worthington, PP #4F3128) discusses the composition of the technical product in detail.

A letter from FMC Corporation (E.M. Cuirle to R. Taylor, 2/1/85) informs us that the batch of Command produced for the 1985 EUP program has been analyzed and found to be within limits as certified in both EUP and registration applications, except that one impurity is present at levels above those previously indicated.

For detailed discussion please see Attachment 1, Confidential Appendix.

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Since this is a preemergent herbicide with a method sensitivity tolerance proposed we cannot imagine that the different impurity level will cause any residue problems. Indeed, we see no reason for concern at all.

Conclusions

RCB does not foresee any residue problems or other reason for concern over this slightly altered impurity profile for Command herbicide.

Attachment 1: Confidential Appendix (Attached copy: PP#3128, R.F., Tox PM]SD/ISB,Reviewer and PM 25 only)

cc: Circ:, R.F., LMB: TOX:PMSD/ISB:Command S.F.: PP# 4F3128: PM 25
RCB:TS-769:L.Bradley:rk:CM#2:Rm810:12/6/85

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