



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 12 1986

MEMORANDUM

Subject: RCB deferral on a formula change for Command

To: Taylor/Yowell, PM-25
Registration Division, TS-767C

From: Marcia van Gemert, Ph.D.
Head, Section III,
Toxicology Branch, HED

M. van Gemert 12.8.86

Thru: Theodore M. Farber, Ph.D.
Chief, Toxicology Branch, HED

Theodore M. Farber 12/19/86

Chemical: Command

Project No: 7-0208

EPA ID #: 279-3054, AC-345

Caswell No: 463D

FMC Corp. has opened a new manufacturing facility for the production of Command technical herbicide. This new plant is to be the only source of active ingredient for formulating the herbicide for the 1987 growing season. They have therefore requested an expedited review.

There will be apparently [REDACTED] impurities produced in this manufacturing process which were not found at the 0.1% level in the original batches and the technical used for toxicology studies.

FMC's confidential statement identifies these new impurities

[REDACTED] They reanalyzed the technical used for toxicology data and showed significantly less than 0.1% of these impurities.

The RCB memo of Dec. 8, 1986 states that "taking into account the use pattern of this herbicide (pre-emergence) and its method sensitivity tolerance we expect no detectable residues ($< 0.01\text{ppm}$) of these new impurities in crops.

At these eventual residue levels we do not have any toxicological concerns about the two new impurities, and when RCB's questions are addressed, we would offer no objection to the new technical replacement for the old one.

IMPURITY INFORMATION HAS BEEN DELETED.