



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

6-13-89  
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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

NOTE TO THE FILE:

- On June 9, 1989 I talked to Dr. David Kiefer and Ms. Eunice Curlie of FMC, (215)299-6999, concerning phytotoxicity requirements for chlomazone (Command Herbicide).

FMC will test the TGAI rather than the formulated product as called for in the Registration Standard. This was agreed to since Subdivision J calls for testing at the Tier I and II level using the TGAI.

Seed germination testing will be conducted at the Tier I level. Radicle length will be measured.

Seedling emergence testing will be conducted at the Tier II level. Percent emergence, shoot dry weight at 28 days after emergence, and a visual phytotoxicity scale will be used to determine the EC<sub>25</sub>'s and EC<sub>50</sub>'s. Root weight will not be determined.

FMC will not conduct Tier II vegetative vigor testing since EEB is currently reviewing data on this topic. If these data are not acceptable, additional testing will be required.

Dose rates should include a nontoxic (no observable-effect level), a subtoxic (<50% level) and a toxic rate (>50% level). To achieve this it may be necessary to have greater than a 2-fold geometric progression between doses. At least five doses should be utilized.

*Charles R. Lewis*  
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June 13, 1989

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