



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

NOV 13 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command

FROM: Thomas E. Adamczyk, Deputy Chief *[Signature]*
Fungicide-Herbicide Branch
Registration Division (TS-767C)

TO: Edwin F. Tinsworth, Deputy Chief
Fungicide-Herbicide Branch
Registration Division (TS-767C)

As you know, Command, a herbicide for soybeans registered last spring, exhibited fairly widespread off-site damage when the product was used during the growing season. EPA Regions, states, and farmers all expressed alarm at the whitening or bleaching effect on vegetation adjacent to soybean fields caused by volatility of the compound. Subsequent investigation showed that the condition was reversible and the affected vegetation recovered.

FMC, the manufacturer of Command, was informed that the off-site damage issue would need to be addressed before we would permit use of the compound in 1987. Since last fall, FMC has taken the following steps:

1. Surface application directions deleted. Must now be soil incorporated; immediately on moist soils, within 3 hours in dry soils.
2. Special, highlighted precaution block added to label concerning off-target movement.
3. FMC has discontinued production of the 6 EC formulation.
4. Detailed drift precautions have been added.
5. Alternate formula submitted which contains [REDACTED] which will reduce volatility.
INERT INGREDIENT INFORMATION IS NOT INCLUDED
6. In conjunction with EPA Regions and States, FMC will conduct an applicator training program.

RECEIVED

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REGISTRATION DIVISION (TS-767C)

With the above listed steps, we now have amended labels in hand which we are ready to accept if one remaining problem can be resolved; the rinsing of spray tanks. The draft label calls for filling the spray tank (after the herbicide is applied) with water and detergent, letting stand overnight, and then spraying the full tank of rinsate back onto the treated field. It then instructs two more fillings with plain water and also spraying on to the field. Then the farmer is supposed to incorporate the rinsate into the soil by additional harrowing.

My own feeling is that no farmer is likely to follow such instructions. If he were using a 250 gallon spray tank, it means he would need three more trips over his field to dispose of the 750 gallons of rinsate, plus an additional trip to incorporate the material. In FMC's defense, it was at the request of Minnesota and Wisconsin state officials that the rinsate instructions were added.

Question

Should we accept labels with direction that we know will not likely be followed?

- |
- what does it mean
- no :- health
- environment
- utility
- any other
- what will it do

11-14-86
ADAMCZYK/TINSWORTH
Decision TO ACCEPT LABEL,