



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

FILE

OCT 26 1987

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command® Technical (EPA Reg. No. 279-3052) and  
Command® 4 EC Herbicide (EPA Reg. No. 279-3053).  
Amendment of 7/27/87 for New Use as Fallow before  
Winter Wheat. No MRID No. RCB No. 2666.

FROM: Kenneth W. Dockter, Chemist *Kenneth W. Dockter*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

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

TO: Robert J. Taylor/James R. Yowell, PM#25  
Registration Division (TS-767)

FMC Corporation is requesting an amended registration for Command® 4 EC Herbicide (EPA Reg. No. 279-3053; 2-(2-chlorophenyl) methyl-4,4-dimethyl-3-isoxazolidinone; FMC 57020; dimethasone) to include directions for use on fallow cropland that is rotated to winter wheat.

No new data is provided in the current submission; draft labels and a data index are.

The petitioner contends, in their requesting letter of 7/27/87, that this is a non-food use.

Recently, this Reviewer was advised that Toxicology Branch defers to Residue Chemistry Branch on this request (personal communication - W. Phang, 10/15/87).

Previously, RCB considered the proposed use of Command® 6 EC as fallow before winter wheat to be a food use. (See L. Propst memorandum of 11/19/86; RCB No. 1348). In that review, we noted that Exposure Assessment Branch had concluded (S. Creeger memorandum of 8/12/86) that low levels of dimethasone residues can be expected in soils 10 months after treatment. This is based on residues found one year post-application of 0.02-0.16 ppm.

Conclusion and Recommendation

Since the appropriate tolerances do not exist, RCB recommends against this proposed new use.

cc: R.F., Circu, S.F., Amended Use file, Dockter, TB (W. Phang),  
PMSD/ISB

RDI: ARRathman:10/22/87:KHArne:10/22/87

TS-769:RCB:CM#2:RM 802:77886:K.W. Dockter:edited by Kd:10/26/87