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June 6, 1986

MEMORANDUM

SUBJECT: Adverse Effects Resulting from Use of COMMAND
EPA Reg. No. 279-3054

FROM: William A. Spratlin, Director /signed/
Air and Toxics Division, Region VII

TO: Director, Office of Pesticide Programs

We have just learned of fairly widespread adverse environmental effects from the use of COMMAND.

Mr. Chuck Eckermann, Pesticide Control Section, Iowa Department of Agriculture, notified this office of at least ten instances in which the product was used according to label directions, yet problems resulted. Mr. Eckermann has discussed the situation with counterparts in Illinois and Minnesota who report similar effects.

For the most part, it appears that adverse effects occur when the pesticide is applied to wet soils, under wet conditions, and is not soil incorporated. Some problems result from applications to dry soils as well. The pesticide does not bind to soil as intended, but codistills with water and evaporates, moving off target by at least 500 yards. When the vapors reach green vegetation, photosynthesis is somehow disturbed and the plant turns white. Mr. Eckermann reports that some instances occurred about two weeks ago and except for ornamental bushes, the plants appear to be recovering.

Problems do not appear to be related to drift or improper dosage rates.

For further information, please contact me directly or Mr. Eckermann. He can be reached at 515-281-8590.

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