

Shaughnessy No.: 128501

Date Out of EFGWB: ~~JUN 17~~ 1990

To: Robert Taylor
Product Manager 25
Registration Division

From: Henry P. Nelson, Acting Chief *H Nelson*
Environmental Chemistry Review Section #3
Environmental Fate and Ground Water Branch/EFED

Through: Henry Jacoby, Chief *Henry Jacoby*
Environmental Fate and Ground Water Branch/EFED

Attached, please find the EFGWB review of . . .

Reg./File # : 264987, 264988, 162448, 162449

Chemical Name : Sulfosate

Type Product : Herbicide

Product Name : Touchdown Concentrate and Touchdown 4LC

Company Name : ICI

Purpose : Screen for Registration on corn and soybeans

Date Received: _____ EFGWB # (s): 900632-3, 900300-1

Action Code : 510

Deferrals to: _____ Ecological Effects Branch, EFED
_____ Science Integration and Policy Staff,
_____ Non-Dietary Exposure Branch, HED
_____ Dietary Exposure Branch, HED
_____ Toxicology Branch I, HED
_____ Toxicology Branch II, HED



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

JUN 17 1990

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: SULFOSATE

FROM: Akiva D. Abramovitch, Ph.D. *Akiva Abramovitch*
Review Section #1
Exposure Assessment Branch/EFED (H7505C)

TO: Cynthia Giles (H7505C)
Registration Division

THRU: Henry Nelson, Ph.D., Acting Chief *H Nelson*
Review Section #3
Environmental Fate and Ground Water Branch/EFED(H7505C)

Henry Jacoby, Chief
Environmental Fate and Ground Water Branch/EFED(H7505C)

Sulfosate passed the EFGWB screen for registration for use on soybeans and corn.

The data requirements already satisfied are as follows:

Hydrolysis on 3/1/84.
Photodegradation in water on 3/1/84.
Photodegradation on soil on 4/27/87.
Aerobic and anaerobic soil metabolism on 6/26/87 and 9/22/87
Leaching and adsorption desorption on 9/22/87.
Fish accumulation on 3/1/84.

Unsatisfied data requirements for registration for use on soybeans and corn are as follows:

Confined (and field) accumulation in rotational crops.
Field dissipations.

The registrant submitted three field dissipation studies addressing the dissipation and leaching of the two sulfosate moieties. Confined crop rotation studies were also submitted. These studies are presently under review by the contractor and will also be evaluated by EFGWB. EFGWB will then decide whether these studies fully address all ground water and accumulation in rotational crops concerns and whether additional field studies are needed. Field

dissipation studies should address the two formulations used on corn and soybeans and be conducted at the maximum application rate and under conditions sulfosate is most likely to exhibit downward mobility.

The label for use on corn allow rotation only to corn. Therefore, without rotation to other crops registration on corn can be issued without acceptable confined (and field) accumulation data. However, no restriction has been placed on the soybeans label to date. Since accumulation was observed in confined crops which are presently under review, unrestricted rotation from soybeans to other crops should not be allowed (unless tolerances on the rotated crops are imposed) until the crop rotation issue is resolved.

Presently all submitted studies are being reviewed for registration for use on corn and may also satisfy the soybeans registration.

CC: William Evans


 United States Environmental Protection Agency
 Office of Pesticide Programs
 Washington, DC 20460

Data Review Record

 Confidential Business Information - Does not contain
 National Security Information (E.O. 12065)

Pack Number

50017

Date Received

EFED

1-17-90

1. Product Name

Touchdown

Chemical Name

Sulfosate

2. Identifying Number	3. Record Number	4. Action Code	5. MRID/ Accession Number	6. Study Guideline or Narrative
10152-276	16245	100		Replaced
10152-277	16249	100		
953796	250410	230		

7. Reference No.	8. Date Rec'd (EPA)	9. Prod/Review Mgr/DCI	10. PM/RM Team No.	11. Date to HED/ EFED/RD/BEAD	12. Proj Return Date	13. Date Returned to RD/SRRD
4	11-9-89	Taylor/Giles	25/Roni	01-16-90	01-31-91	

Instructions

Bound sheet for New Chemical / First Field Use - Sulfosate

The submissions were submitted under the file symbols
 10152-ETA and 10182-ETT. Data in the branch.

Attention: Akiva Abramovitch

This Section Applies to Review of Studies Only

14. Check Applicable Box

- ☐ Adverse 6(a)(2) Data (405)
 ☐ Generic Data (Reregistration) (660)
 ☐ Special Review Data (870)
 ☐ Product Specific Data (Reregistration) (655)

15. No. of Individual Studies Submitted

16. Have any of the above studies (in whole or in part) been previously submitted for review?

- ☐ Yes (Please identify the study(ies))
 ☐ No

17. Related Actions

18.	To	Type of Review	19. Reviews Also Sent to	20. Data Review Criteria
HED		Science Analysis & Coordination	<input checked="" type="checkbox"/> SAC <input type="checkbox"/> PC	A. Policy Note No. 31 <input type="checkbox"/> 1 = data which meet 6(a)(2) or meet 3(c)(2)(B) flagging criteria <input type="checkbox"/> 2 = data of particular concern from registration standard <input type="checkbox"/> 3 = data necessary to determine tiered testing requirements
		Toxicology/HFA	<input checked="" type="checkbox"/> TOX/HFA <input type="checkbox"/> PL	
		Toxicology/IR	<input checked="" type="checkbox"/> TOX/IR <input type="checkbox"/> EA	
		Dietary Exposure	<input type="checkbox"/> DEB <input type="checkbox"/> AC	
		Nondietary Exposure	<input type="checkbox"/> NDE <input type="checkbox"/> BA	
EFED	<input checked="" type="checkbox"/>	Ecological Effects	<input checked="" type="checkbox"/> EEB	B. Section 18 <input type="checkbox"/> 1 = data in support of section 3 in lieu of section 18 C. Inert Ingredients <input type="checkbox"/> 1 = data in support of continued use of List 1 inert
	Environmental Fate & Groundwater	<input type="checkbox"/> EFGWB		
SRRD		Special Review	<input type="checkbox"/> SR	
	Reregistration	<input type="checkbox"/> RER		
	Generic Chemical Support	<input type="checkbox"/> GSC		
RD		Insecticide-Rodenticide	<input type="checkbox"/> IR	
		Fungicide-Herbicide	<input type="checkbox"/> FH	
		Antimicrobial	<input type="checkbox"/> AM	
		Product Chemistry		
BEAD		Precautionary Labeling		
		Economic Analysis		
		Analytical Chemistry		
		Biological Analysis		

☐ Confidential Statement of Formula (EPA Form 8570-4) Attached (Trade Secrets)
 ☐ Label Attached

128501

EFGWB

NEW CHEMICAL/FIRST FOOD USE SCREEN

1. FILE SYMBOL/REG NO. (RSERB) 10182 - ETT / 10182 - ETA
2. TOLERANCE PETITION NO. (RSERB) 9F3796
3. CHEMICAL NAME (RSERB) Sulfosate (N-phosphonomethylglycine trimethylsulfonium salt)
4. PESTICIDE CHEMICAL CODE (RSERB) 128501
5. PRODUCT NAME (RSERB) Touchdown 4LC / Touchdown Concentrate
6. PM (RSERB) 25 7. PM TEAM REVIEWER (PM) Cynthia Giles
8. DATE OF RECEIPT (RSERB) 11-9-89
9. USE PATTERN (PM) For use on corn
10. DATE OF TRANSMISSION TO PM (RSERB) 12-12-89
(EPA Receipt Date Plus 3 Days)
11. DATE OF TRANSMISSION TO HED (PM) 12-13-89
(PM Receipt Date Plus 5 Days)
12. HED DUE DATE FOR COMPLETION OF SCREEN (RSERB) _____
(HED Receipt Date Plus 7 Days)
13. HED REVIEWER (HED) _____
14. HED REVIEW COMPLETION DATE (HED) _____
(EPA Receipt Date Plus 45 Weeks)
15. RECORD NUMBER (PM) 162449 / 162448

REGISTRANT PHONE CONTACT INFORMATION (PM)

Date of Contact _____

Person Contacted _____
Title _____Decision & Comments _____

_____STATUS OF PACKAGE☒ Passed Screen☒ Failed Screen
(Documentation attached)

NEW CHEMICAL FIRST FOOD USE SCREEN

1. FILE SYMBOL/REG NO. (RSERB) 10182-276 and 10182-277
2. TOLERANCE PETITION NO. (RSERB) Ø F 386 Ø
3. CHEMICAL NAME (RSERB) glyphosate, trimethylsulfonium salt (sulfosate)
4. PESTICIDE CHEMICAL CODE (RSERB) 128501-4
5. PRODUCT NAME (RSERB) Touchdown Concentrate and Touchdown 4LC
6. PM (RSERB) 25 7. PM TEAM REVIEWER (PM) C. Giles
8. DATE OF RECEIPT (RSERB) 4-9-90
9. USE PATTERN (PM) Annual weeds, perennial weeds and broadleaf weeds in soybeans and noncrop areas around the farm
10. DATE OF TRANSMISSION TO PM (RSERB) 5-21-90
(EPA Receipt Date Plus 3 Days)
11. DATE OF TRANSMISSION TO HED (PM) 5-30-90
(PM Receipt Date Plus 5 Days)
12. HED DUE DATE FOR COMPLETION OF SCREEN (RSERB) 6-12-90
(HED Receipt Date Plus 7 Days)
13. HED REVIEWER (HED) _____
14. HED REVIEW COMPLETION DATE (HED) _____
(EPA Receipt Date Plus 45 Weeks)
15. RECORD NUMBER (PM) 264987 and 264988
Petition Record # 263880

REGISTRANT PHONE CONTACT INFORMATION (PM)

Date of Contact _____
Person Contacted _____
Title _____
Decision & Comments _____

STATUS OF PACKAGE
☒ Passed Screen
☒ Failed Screen
(Documentation attached)