

JUL 11 1990

PP # 9F3714

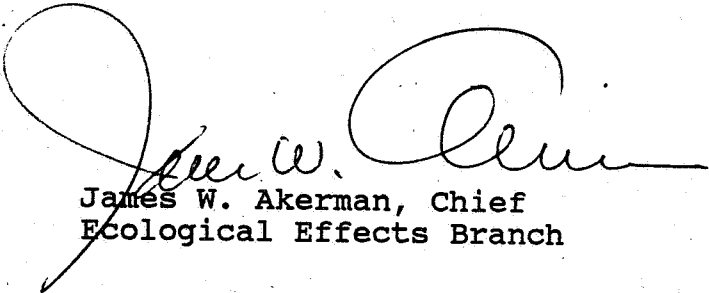
7-11-90

Note to JoAnn Miller PM-23

The Ecological Effects Branch has re-considered it's review of TILLER HERBICIDE and the proposed use on wheat. TILLER contains three active ingredients: 2,4-D; MCPA; and fenoxaprop-ethyl. Both 2,4-D and MCPA are currently registered for use on wheat. In our 5/3/89 review of fenoxaprop-ethyl on wheat EEB concluded minimal acute and chronic risks (and acceptable supporting data).

We understand that Hoechst Celanese Corporation has requested a formulator's exemption for the supporting data for 2,4-D and MCPA. The registrant has provided acceptable data to support the registration of fenoxaprop-ethyl on wheat.

EEB believes that RD could issue a conditional registration for TILLER. Only after acceptable data for 2,4-D and MCPA have been submitted can EEB conduct a full risk assessment. The incremental risk posed by TILLER during a period of conditional registration would be insignificant.



James W. Akerman, Chief
Ecological Effects Branch

cc: EEB File