

DP Barcode : D176595  
 PC Code No : *not assigned yet.*  
 EEB Out :   
 APR 15 1992

To: JOANNE MILLER  
 Product Manager  
 Registration Division (H7505C)

From: Douglas J. Urban, Acting Chief  
 Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 62719-EEG  
 Chemical Name : DE-498 ORYZALIN & FLUMETSULAM  
 Type Product :  
 Product Name :  
 Company Name : DOWELANCO  
 Purpose : CONSIDER PROPOSAL TO ALTER PROTOCOL FOR  
 CONDUCTING TERRESTRIAL TIER I AND TIER II PLANT TESTS

Action Code : 117 Date Due : 8-1-92  
 Reviewer : CHARLES LEWIS

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but additional information is needed)

S=Supplemental (Study provided useful information but Guideline was not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur





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

APR 15 1992

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

SUBJECT: Request by DOW to Change Plant Test Protocol  
D176595

FROM: Douglas J. Urban, Acting Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division H7507C

TO: Joanne Miller, PM 23  
Herbicide Fungicide Branch  
Registration Division H7505C

The EEB has reviewed the proposed request to alter the dilution rates used in TIER II terrestrial plant testing (123-1) for two pesticides, Oryzalin and Flumetsulam. The registrant is proposing to increase the between concentration interval from the 2X rate normally suggested to a 3X rate to accomodate potentially greater variation in sensitivity between plant species. The attached March 31, 1992 letter specifies the proposed test concentrations for these two pesticides. The highest rates represent the proposed application rate.

The EEB approves of this proposed modification. For questions, contact Charles Lewis.





March 31, 1992



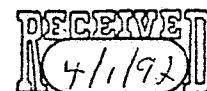
Joanne I. Miller (H7505C)  
Registration Division  
U.S. Environmental Protection Agency  
Crystal Mall #2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Charles R. Lewis (H7507C)  
Ecological Effects Branch  
U.S. Environmental Protection Agency  
Crystal Mall #2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

RE: Non Target Plants - Guideline Ref. No.'s 122-1 and 123-1  
Oryzalin and Flumetsulam  
Request for Protocol Deviation

On March 24 and 25, 1992, DowElanco, in conversations of O. Dean Decker with Charles R. Lewis (Ecological Effects Branch) and Dennis Lade with Joanne I. Miller (Registration Division) discussed the possibility of modifying the above-mentioned protocols using the above-mentioned products. This letter is to officially request these changes as indicated below.

As part of the Non Target Plant study, one set of samples are treated at the maximum use rate to satisfy the Tier I Guideline Study 122-1. Since the maximum active ingredient application rate of oryzalin is 6 lb/A (a high application rate) and DE-498 (flumetsulam) is 0.0675 lb/A (a low application rate), it was agreed that the dilution rates may need to be changed from the two-fold dilution rate to a three-fold dilution rate. It is believed that due to the high application rate of oryzalin and the activity of the DE-498, the EC25, EC50 or the NOEL might not be attained using the two-fold dilution regime on a sensitive specie.





Joanne I. Miller  
Charles R. Lewis  
U.S. Environmental Protection Agency  
March 31, 1992  
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For Comparison, the dilution rates would be modified as follows:

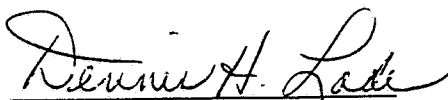
<u>Concentration in Lb/Acre</u>			
<u>Oryzalin</u>		<u>DE-498</u>	
<u>2xDilution</u>	<u>3xDilution</u>	<u>2xDilution</u>	<u>3xDilution</u>
6.00	6.00	0.068	0.068
3.00	2.00	0.034	0.023
1.50	0.67	0.017	0.0076
0.75	0.22	0.0085	0.0025
0.38	0.074	0.0043	0.00084
0.19	0.025	0.0021	0.00028
0.01	0.008	0.0011	0.00009
0.00	0.00	0.00	0.00


As mentioned, this scenario was discussed by O. Dean Decker with Charles Lewis who felt that requesting the three-fold dilution would be acceptable.

Your fast response would be appreciated as these studies are to be initiated in April, 1992.

If questions, you may reach Mr. Decker at (317) 277-4342 or Dr. Lade at (317) 870-7269.

Sincerely,

  
Dennis H. Lade, Ph.D.  
Product Registration Manager

  
O. Dean Decker  
Sr. Scientist Study Monitor

DLG/kle