

(C)

In reference to your letter of March 28, 1974, we are withdrawing comments 1 and 2 of our letter of January 4, 1974. # We regret the unfortunate fact that the only DyfonateTM EC which was available for use on tobacco at the time the EPA Compendium section on this chemical was prepared was the combination with Tillam. This resulted in the restriction to use on flue-cured tobacco only. We will issue a correction of this entry in the next supplement of the compendium.

Similarly, the only registered uses for Dyfonate on mint at the time of preparing the Compendium were for the 10G and 4E, both of which carried the caution against feeding mint hay to livestock which was consequently adopted as part of the text. ~~But~~ We will delete this sentence in the next Compendium supplement also. We sincerely regret any inconvenience this error may have caused you and appreciate your calling it to our attention.

6/6/74

2044

WESTERN
RESEARCH CENTER



Stauffer Chemical Company
1200 South 47th Street / Richmond, California 94804 / Tel. (415) 233-9361

March 28, 1974

Mr. James M. Rea
Acting Section Head
Insecticide-Rodenticide Branch
Registration Division
Pesticides Office
Environmental Protection Agency
Washington, D.C. 20460

Subject: DYFONATE 4-EC, EPA Reg. No. 476-2134
Your letter of January 4, 1974

Dear Mr. Rea:

Confirming my telephone conversation of March 25th with Ms. Marilyn Mantz on the subject, we offer the following comments in reply to your letter of January 4, 1974 (copy attached).

Concerning Item 1, a 0.1 ppm negligible residue tolerance was established on September 9, 1971 (Pesticide Petition 0F0960) covering both peppermint hay and spearmint hay. A meat and milk residue study was submitted in support of all the Dyfonate forage crop registrations, and removal of the feeding restriction for mint hay on the Dyfonate 4-E label (476-2056) was approved on January 5, 1973. This meat and milk residue study was also submitted in support of the Dyfonate 4-EC label (476-2134), and the 4-EC label was registered on February 15, 1973 without this feeding restriction. We believe that the data previously submitted fully support the continued omission of this restriction from the Dyfonate 4-EC label.

With regard to Item 2, the use of Dyfonate 4-E and 4-EC has never been restricted to flue-cured tobacco. The only tobacco restriction in effect is found on the Dyfonate-Tillam 1-4-E label (476-2071), where use is restricted to flue-cured tobacco because of the Tillam selective herbicide in the product.

EPA

4-7-74

Mr. James M. Rea
March 28, 1974
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Regarding Item 3, the front panel precautionary labeling will meet the type size and prominence requirements, and the word POISON will appear in red on a contrasting background. Please note that the copies of labeling submitted for review were black and white photo reductions of five gallon drum lithography.

We trust that this information will remove the objections that prompted the first two comments noted above, and that your requests for these labeling restrictions will be withdrawn.

Sincerely yours,

STAUFFER CHEMICAL COMPANY

Ralph L. Riggs

Ralph L. Riggs
Research Chemist
Pesticide Registrations

RLR/dd
Attachment
CC: Ms. Marilyn S. Mantz

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STAUFFER CHEMICAL COMPANY
1200 South 47th Street
Richmond, California 94804

4 JAN 1974

DYFONATE 4-EC
EPA Reg. No. 476-2134
Your application of November 13, 1973

1. Add the following statement to the paragraph on mint: "Do not feed mint hay to livestock."
2. Add the following statement to the paragraph on tobacco: "For use on flue-cured tobacco only".
3. The front panel precautionary labeling must meet the type size and prominence requirements.

It is understood that the word POISON appears in red on a contrasting background.

Sincerely,

James M. Rea
James M. Rea
Acting Section Head
Insecticide-Rodenticide Branch

EPA: PR: RT: vp 1-4-74
Form 9-25
C-CM: SH-ABK: SE-JM: I-VLM