



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

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

MEMORANDUM

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SUBJECT: Verification Memorandum for Simazine for SF Bay Species

FROM: Melanie Biscoe, Chemical Review Manager
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THRU: Kevin Costello, Team Leader
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TO: Rafael Prieto
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This memorandum serves to provide additional information on the use pattern of simazine not captured in the LUIS process. RD and SRRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and SRRD.

SRRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED Spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification" section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

Finally, if further clarification is needed please contact Anne Overstreet or Melanie Biscoe.

¹ This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain: 1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active special local needs (SLN) registrations.

Registration and Reregistration Verification

Date and Scope of the RED

- The RED for Simazine was issued in April 2006.
- Simazine's two chlorinated degradates, DIA and DACT, were evaluated in the RED and was assumed to have equal toxicity to the simazine parent.

Required Through the RED Process

Residential Risk Mitigation

The use of simazine by **homeowners using hand-held devices (e.g., belly grinders or handheld rotary applicators) must be restricted to spot treatment only** and a statement must be added to end-use product labels indicating this restriction.

Aggregate Risk Mitigation

No additional risk mitigation is necessary to specifically address aggregate risk.

Occupational Risk Mitigation

To reduce exposure to simazine for occupational handlers and to address subsequent risks of concern, the following mitigation measures are necessary:

- **prohibit use as “non-selective weed control on non-crop land”** on product labels;
- **prohibit formulation of simazine into wettable powder formulations;**
- **prohibit formulation of simazine into granular formulations for occupational use, which includes uses covered under the WPS and non-WPS commercial uses;**
- **prohibit aerial application** and add a statement to product labels indicating this prohibition; and
- **reduce application rate on corn to a maximum of 2 pounds active ingredient per acre (lbs ai/A) per application and a maximum of 2.5 lbs ai/A per year.**

Additionally, the RED requires the following mitigation measures:

- **additional rate reductions to typical rates** as specified in the label table - see pages 62-77 of the RED at http://www.epa.gov/pesticides/reregistration/REDs/simazine_red.pdf.
- **reduce the application rate on grapes to a maximum of 4 lbs ai/A per application and per calendar year.**
- for many of simazine's use scenarios, the PPE necessary to reduce occupational handler risks below the Agency's level of concern is **chemical-resistant gloves** (as specified in the label table - see pages 62-77 of the RED at http://www.epa.gov/pesticides/reregistration/REDs/simazine_red.pdf).
- **in addition to gloves, mixer/loaders of dry flowable formulations supporting groundboom applications need to wear coveralls over their long-sleeve shirts and pants, chemical-resistant footwear, and PF 5 NIOSH-approved respirators with a dust/mist filter**

REI Requirements:

- **REI for Christmas trees of 48 hours**
- **watering-in of products that can be used on turfgrass on sod farms when the rate is greater than 2 lbs ai/A**

- WPS-required **REI of at least 12 hours for all other uses**

Ecological Risk Mitigation

- **prohibit use as “non-selective weed control on non-crop land”** on product labels;
- **prohibit formulation of simazine into granular formulations for agricultural use;**
- **reduce maximum application rates to typical rates** specified in the label table- see pages 62-77 of the RED at http://www.epa.gov/pesticides/reregistration/REDs/simazine_red.pdf), **further restrict use on corn in areas with highly erodible soils (similar to rate reductions for use of atrazine on corn), and harmonize application rates on simazine product labels.**
- **prohibition of aerial application of simazine**, a risk mitigation measure necessary to reduce drinking water and occupational exposure and subsequent risks of concern will have an overall effect of reducing aquatic and terrestrial organism exposure to simazine.
- **addition of pesticide-specific label language describing the environmental hazards of simazine use and restricting spray drift as further detailed in the label table** (see pages 62-77 of the RED at http://www.epa.gov/pesticides/reregistration/REDs/simazine_red.pdf) will have an overall effect of reducing aquatic and terrestrial organism exposure to simazine.
- The highest use rates are accurately reflected in the EFED Spreadsheet.

Product Reregistration

- Only two simazine products have been put through to label review under PRD’s PRB reregistration process (Bonnie Adler is the contact). 28 are still in process. Studies for products are still coming in; PRB anticipates that most labels should be ready to undergo review in the spring. As such, mitigation required in the simazine RED is not currently reflected on all labels including prohibition of wettable powders, prohibition of aerial application, reduced application rates for several crops, and an increased REI for Christmas tree use.

Registration Division Review

- There are no actions that have occurred since the PRD date that impacts the use or application of simazine. There are no pending actions in RD.