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

OPP OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

Date: **September 8, 2009**

SUBJECT: **Dicamba.** Response to Comments on Residue Data Requirements.

PC Code: 029801
Decision No.: 357482
Petition No.: Not Applicable
Risk Assessment Type: Not Applicable
TXR No.: Not Applicable
MRID No.: None

DP Barcode: D317693
Registration No.: Not Applicable
Regulatory Action: Waiver Request
Case No.: 0065
CAS No.: 1918-00-9
40 CFR: 180.227

FROM: Christine L. Olinger, Chemist
Risk Assessment Branch VII
Health Effects Division (7509P)
Office of Pesticide Programs

THRU: Michael S. Metzger, Chief,
Risk Assessment Branch VII
Health Effects Division (7509P)
Office of Pesticide Programs

TO: Jennifer Howenstine, CRM
Reregistration Branch 1
Special Review and Reregistration Division (7508P)
Office of Pesticide Programs

I. ACTION REQUESTED

BASF has submitted a response to the Data Call-In (DCI) to support the reregistration of the herbicide dicamba (GDCI-29801-27682). The registrant has requested waiver of a few studies, and cited existing studies for additional requirements.

II. DETAILED CONSIDERATIONS

A brief description of the rationale for the waiver request for each guideline is provided below, followed by the HED response.

830.7050 UV/VIS Absorption

Registrant Position
The registrant has cited MRID 47504709.

Agency Response
The study was submitted to the Agency August 6, 2008. There is no record in ChemDOCS that the study has been reviewed.

860.1340 Residue Analytical Method

Registrant Position
The registrant has cited MRID 43461701 for fulfilling the requirement for a livestock method. The cited MRID is an ILV for a method that analyzes for parent and DCSA. The registrant has also cited MRID 44891301, which is an ILV for a method that analyzes for dicamba and 4-OH dicamba in plant raw and processed commodities.

Agency Response
Following are the citations for the studies:

43461701 Baldi, B. (1994) Confirmatory Method Trial of the Residue Method, AM-0938-0994-0, "Determination of Dicamba and Dichlorosalicylic Acid Residues in Beef Tissues (GC)": Final Report: Lab Project Numbers: 94-0037: 09/94-AM. Unpublished study prepared by EN-CAS Analytical Labs. 115 p.

MRID 44891301 Guirguis, M.; Perez, R.; Almaraz, O. (1999) Validation of Sandoz Analytical Method No. AM-0691B-0297-4: Determination of Dicamba and 5-Hydroxy Dicamba Residues in Barley, Corn, Cotton, Cotton Processed Fractions, Pasture Grass, Peanut, Sorghum, Soybean, Sugar Cane, Tomato, Tomato Processed Fractions, Wheat and Wheat Processed Fractions (GC) and Method No. AM 0941-1094-0: Determination of Dicamba, Dichlorosalicylic Acid and 5-Hydroxy Dicamba Residues in Asparagus and Soybeans: Lab Project Number: 903-98126. Unpublished study prepared by Adpen Laboratories. 36 p. {OPPTS 860.1340}

HED could find no record that these studies had been reviewed by HED, so they should be forwarded to HED for review.

860.1360 Multi-Residue Method Testing

Registrant Position
The registrant has agreed to conduct the study.

Agency Response
None Required

860.1380 Storage Stability Data

Registrant Position
The registrant has cited MRID 46668101 to fulfill the requirement for storage stability data for dicamba and DCSA in livestock tissues and milk, for a total of 18 months of storage. The registrant has cited 43245204 to fulfill the requirement for storage stability data for sugarcane and processed fractions for 60 days.

Agency Response
MRID 46668101 was reviewed by HED in 2005 (C. Olinger, 12/8/05, D320564 and D322842) and found acceptable. No additional livestock storage stability data are required.

MRID 43245204 was reviewed in 1997 by L. Cheng (7/31/97, DP Barcodes D204488, D204809, and D209229). In this study, sugarcane and sugarcane processed commodities were analyzed initially after 58-64 days of storage and again after 120 days of storage. Residue levels were comparable at both storage intervals. Storage stability studies conducted in other commodities, as described in the Residue Chemistry Chapter to the RED (C. Olinger, 12/20/05, D317699), generally show that dicamba residues are stable, up to three years in some corn commodities. Combined with all of the available information on the stability of dicamba residues in plant commodities, HED agrees that the cited study fulfills the requirement for storage stability data in sugarcane processed commodities. No additional data are required.

860.1500 Field Trial Data – Soybean Forage and Hay

Registrant Position
The registrant has requested a waiver of this requirement and has cited MRID 44089307. According to the registrant, this study reflects preplant and preharvest applications of dicamba, includes a decline study, and was used to set the 14-day pre-harvest interval (PHI). Although forage and hay were not analyzed in this study, the registrant's products include a livestock feeding restriction when the product is applied pre-harvest.

Agency Response
HED has confirmed that the registrant's labels do specify a feeding restriction when dicamba is applied to soybeans pre-harvest. Therefore, the field trial data for soybean forage and hay are not required.

860.1500 Field Trial Data – Sugarcane

Registrant Position
The registrant has requested a waiver of this study, and has cited MRID 44089302. In conjunction with the Reregistration Eligibility Decision (RED), the registrant accepted rate limitations of 1 lb ae/A for single application, and an annual rate limitation of 2 lb ae/A.

Agency Response

MRID 44089302 has been reviewed by the Agency (DP Barcodes D320550 and 320551; 12/8/05; C. Olinger) June 17, 2009, and includes field trials conducted at 2 ae/A. According to the Agency RED (6/17/09), the maximum application rate for sugarcane has been reduced to 2 ae/A. Sufficient residue data are available reflecting the revised application rate, so HED has no objection to waiving the sugarcane field trials.

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R176486

Chemical Name: Dicamba

PC Code: 029801
HED File Code: 11100 Other Chemistry Documents
Memo Date: 9/8/2009
File ID: 00000000
Accession #: 000-00-0132

HED Records Reference Center
9/15/2009