482015-00

Bayer CropScience

11 August 2010
Document Processing Desk
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attn: Ms. Kathryn Montague (PM 23)
Mr. James Stone (PM Team 23)

RE: Support of Petitions 9E7604 & 9F7655
Glufosinate-ammonium Technical Herbicide (EPA Reg. No. 264-646)
Liberty Herbicide (EPA Reg. No. 264-660)
Ignite® and Rely® 280 SL Herbicide (EPA Reg. No. 264-829). Alternate Brand Names for Liberty® 280 SL Herbicide (EPA Reg. No. 264-829).

Dear Ms. Montague and Mr. Stone:

Per our communication on 14 July 2010, attached to this cover please find three copies of two study reports addressing an analytical method for determining glufosinate in plant matrices (Method GL-001-P07-01) and a storage stability study addressing the stability of glufosinate-ammonium in frozen citrus and kiwi.

Attached to this cover letter, please also find the following:

1). A completed copy of Form 8570-1 (Application for Pesticide) for the Glufosinate-ammonium Technical Herbicide (EPA Reg. No. 264-646).
2). Data Matrix for internal EPA uses (Form 8570-35).
3). A blackened copy of the Data Matrix form for public use.
4). Transmittal document (Document 1 of 3).

Please contact me at your earliest convenience if you have any questions or require additional information.

Sincerely,

Mike See, Ph.D.
Registration Manager
Phone: *(919) 549-2913*
Fax: *(919) 549-2545*
e-mail: *mike.see@bayercropscience.com*

Transmittal Document

Document 1 of 3

OPPTS 860 Series Guideline

OPPTS Guideline 860.1340 Residue Analytical Method
OPPTS Guideline 860.1380 Plant Storage Stability

In Support Of

Glufosinate-Ammonium Technical Herbicide (EPA Registration Number 264-645)
Liberty® 280 Herbicide (EPA Registration Number 264–829)
Petitions 9E7604 & 9F7655

Transmittal Date

11 August 2010

Company Official: _____(signature)

Company Name: Bayer CropScience

Company Contact: Mike See

Telephone: (919) 549-2913

Bibliography of Submitted Studies

Product (EPA Registration Number): Glufosinate-ammonium Technical (EPA Reg. No. 264-645)

Purpose of Submission: Follow-up to the Bayer Petitions 9E7604 & 9F7655

Date of Submission: 11 August 2010

Doc. Number	Study Reference	Submitter Document Number	EPA Guideline Number	EPA MRID Number
1 of 3	Transmittal Document	NA	NA	NA
2 of 3	Murphy, I. and G. Roberts. 2007. An Analytical Method for the Determination o Residues of Glufoainte in Crop Mqatrices Using LC/MS/MS. Study Number GL-001 P07-01. 7 pp.	**GL-001-P07-01**	860.1340	**48201501**
3 of 3	Meikle, S. and D. Williamson. 1991. Storage Stability of Glufosinate-ammoniun (HOE039866) and HOE 061517 in or on Frozen Citrus and Kiwi. 117 pp.	**A46904**	860.1380	**48201502**

Bayer CropScience
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, NC 27709