



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

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Robert Peterson, PhD.  
Bldg. 308-2E  
Dow AgroSciences  
9330 Zionsville Road  
Indianapolis, IN 46268

Subject: Response to your Comments on the Triclopyr RED

Dear Dr. Peterson:

The Agency has completed its review of the information you provided on the use of triclopyr on cattle rangelands in response to the Agency's Reregistration Eligibility Decision (RED) on triclopyr. A copy of the Agency's February 29, 2000, review is enclosed for your records. Based on this review, the Agency has determined that the maximum rate for triclopyr on grasses may be increased from 1 lb ai/A, as specified in the RED, to 2 lb ai/A. The RED will be amended such that the maximum reassessed tolerance for grass forage is increased from 500 ppm to 700 ppm. The reassessed tolerance for grass hay remains at 200 ppm and the current tolerances on meat commodities are adequate to cover residues that may occur from grazing areas treated at 2 lb ai/A. If you have any additional questions or concerns, please contact me at (703) 308-8074.

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Monos".

Dean Monos, Chemical Review Manager  
Reregistration Branch 3  
Special Review and  
Reregistration Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

February 29, 2000

**MEMORANDUM**

**SUBJECT:** Triclopyr: Chemical Nos. 116001, 116002, 116003, 116004; DP Barcode D261608. Registrant's Comment on the Triclopyr Reregistration Eligibility Decision.

**FROM:** William O. Smith, Chemist  
Chemistry and Exposure Branch 1  
Health Effects Division (7509C)

**THROUGH:** F. B. Suhre, Branch Senior Scientist  
Chemistry and Exposure Branch 1  
Health Effects Division (7509C)

**TO:** Dean Monos/PM 53  
Special Review and Reregistration Division (7508C)

**Action Requested**

SRRD requests that HED address Dow Agrisciences comments on our recommendation in the Triclopyr RED for reduction of maximum use rates on rangeland and pastures to 1 lb. ae/A.

**Background**

One of the recommendations in the Triclopyr RED was to reduce the maximum application rate on pasture and rangeland to 1 lb. ae/A/yr. This recommendation was based on the fact that the current tolerance of 500 ppm was not supported by residue data from higher rates.

**Registrant's Comments**

Dow Agrisciences contends that a reduction in the maximum use rate on grasses to 1 lb. ae/A would have a significant negative impact on the usefulness of triclopyr for controlling brush and broadleaf weeds. They propose a maximum rate of 2 lb. ae/A/yr and an increase in the tolerance

from 500 ppm to 700 ppm. They point out that residue results from 61 individual field sites (MRIDs 41961001, 0071801, 00070042, 00134173, 00151968, and 00134175) for triclopyr applications ranging from 1.5 to 9 lbs ae/A show that residues on grass and hay increase linearly with application rate. These data support application rates of 2 lb. ae/A with an increase in the current tolerance level for grass forage from 500 ppm to 700 ppm.

#### **HED Conclusions and Recommendation**

We find the registrant's proposal to be an acceptable alternative to the recommendations in the RED. We now recommend that all labels for triclopyr formulations used on pasture and rangeland be amended to specify a maximum application rate of 2 lb. ae/A per annual growing season. As a result of this change the reassessed tolerance for grass forage is increased from 500 ppm to 700 ppm. The reassessed tolerance for grass hay remains at 200 ppm. The current tolerances on meat commodities are adequate to cover residues that may occur from grazing areas treated at 2 lb. ae/A. Therefore, the current dietary risk assessment, which is based on tolerance level residues and 100% crop treated (and indicates little dietary risk) supports the changes recommended here. There is no need to conduct another dietary risk assessment for this change.

cc: WSmith (CEB1), RF.  
7509C:CEB1:WSmith:Rm 810C:CM2: 703-305-5353: 2/29/00.