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syngenta

March 24, 2005

Public Integrity Branch (PIRIB) (7502C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1801 Bell Street
Crystal Mall 2, Room 119
Arlington, VA 22202-4501
Attention: Docket ID Number OPP-2004-0347

Dear Sir/Madam:

SUBJECT: COMMENTS ON FLUAZIFOP-P-BUTYL (OPP-2004-0347)
RISK ASSESSMENTS: NOTICE OF AVAILABILITY

Enclosed please find the comments from Syngenta Crop Protection, Inc. on the subject action, published for public comment in the Federal Register on Wednesday, January 26, 2005 (FR Vol. 70. No.16, pp. 3702-3704).

Overall, Syngenta commends the Agency for the careful evaluation of this compound in the Tolerance Reassessment Decision (TRED) process. For many of the documents posted for public comment, we do not feel it necessary to provide comment, so our comments are somewhat limited. These comments are contained in the attached document.

If there is any further questions regarding this matter, or if we can provide further information, please telephone Greg Watson at (336) 632-2993 or myself at (336) 632-7207.

Sincerely,

Thomas J. Parshley

Thomas J. Parshley
Senior Regulatory Product Manager
Regulatory Affairs

CC: Cathryn O-Connell (SRRD)

ATTACHMENT: SYNGENTA PUBLIC COMMENTS

Document: Fluazifop-P-butyl: Revised Residential Exposure Assessment and Recommendations for the Tolerance Reassessment Eligibility Decision (TRED) Document. PC Code 122809, DP Barcode DP-291905
Document Date: November 29, 2004.
Authors: Margarita Collantes

Header	**Page #, Paragraph***	**Comments**
Table 10	26, 2nd row in table	1. The MOE for the 0.075 lbs ai per acre turf rate is not correct. Value should be 3400.
Table 11	28, last section concerning the 0.075 lbs ai/A turf application rate	2. The MOE for hand to mouth is not correct, value should be 89,000. Value for high contact dermal exposure is not correct, should be 3400. The combined non-dietary risk is not correct, it should be 3300.
Appendix Table 1	31, 0.075 lbs ai/A application rate line	3. The MOE indicated (6,000,000) is not correct. The value should be 89,000.
Appendix Table 4	34, 0.075 lbs ai/A turf application rate line for high contact lawn activities	4. The 170,000 indicated MOE is not correct. The MOE should be 3400.

* Paragraph designation is from top of page

Document: Fluazifop-P-butyl: Revised HED Chapter of the Reregistration Eligibility decision Document (RED). PC Code 122809, Case # 2285, DP Barcode D291903.
Document Date: December 10, 2004.
Authors: Diane Locke, et.al.

Header	Page #, Paragraph*	Comments
2.1.1	77, paragraph 6	1. Please change "...slight relative liver weights..." to "...relative liver weights..."

Document: Fluazifop-P-butyl: Tier 1 Drinking Water Assessment for Fluazifop-P-butyl.
Document Date: October 29, 2003.
Authors: William Eckel (EFED)

Header	Page #, Paragraph*	Comments
Model Input Data	2, 6-7	1. Parent and acid should have been modeled separately and their results summed to provide a combined EDWC.
Model Input Data	4, Table 2	2. Koc: There should be an input of 1190 mL/g for parent.
Model Input Data	4, Table 2	3. The water solubility value cited is in error. The actual solubility data for parent is 1.1 mg/mL and 780 mg/mL for the acid. This was already discussed in Syngenta's Phase 1 response.
Model Input Data	4, Table 2	4. "Soil Half-life" (per EPA guidelines): The inputs for FIRST (t-90 test) should be 0.47 days for parent and 16.4 days for acid. The inputs for SCI-GROW should be 0.37 days (average) for parent and 9.1 days (median) for acid. (See EPA MRID 46190602)
Model Input Data	4, Table 2	5. "Aqueous Half-life": Per EPA guidelines, there should be an aerobic aquatic metabolism half-life input of 0.08 days for parent and 73.2 days for acid (See EPA MRID 46190605). The hydrolysis half-life inputs should be 78 days for parent and "stable" for acid.
Model Input Data	4, Table 2	6. Photolysis Half-life: There should be an input of 6.02 days for parent.
Results	4, 2	7. As already discussed in Syngenta's Phase 1 response: When modeling the acid, a molecular weight adjustment should have been made to the application rate. This is true for both ground and surface water, at both Tier 1 and Tier 2.

Results	4,2-3	8. Model input issues, already pointed out in the Table 2 discussion.

Document: Fluazifop-P-butyl: Tier II Drinking Water Assessment for Fluazifop-P-butyl and its Major Degradate Fluazifop-acid.
Document Date: June 30, 2004.
Authors: William Eckel (EFED)

Header	**Page #, Paragraph***	**Comments**
	2,2	1. "1.125 lb active ingredient per acre per year" –it appears EPA actually modeled the acid at that rate, without adjusting for the molecular weight difference (see comments on the Tier 1 assessment in Syngenta's Phase 1 response). The PRZM-EXAMS assessment is based upon fluazifop acid, but the rate of 0.375 lbs. ai/A is for the AI (in this case, shown as 0.42 kg/ha). The rae should be adjusted due to the molecular weight difference between the parent and acid. This would give a rate of 0.32 lbs. fluazifop acid/A, or approximately 0.36 kg/ha.
Input parameters	2,3	2. Parent and acid should have been modeled separately and their results summed to provide a combined EDWC.
Input parameters	2, Table 1	3. Molecular Weight: EPA should have modeled the acid, at MW = 327.3 g/mol
Input parameters	2, Table 1	4. Henry's Law Constant: EPA should have modeled the acid, at HLC = 3.2 E-12 atm-m^3/mol.
Input parameters	2, Table 1	5. There continue to be errors presented for Water solubility. See similar comment in this document for the Tier I drinking water assessment. Also, please refer to the Syngenta's Phase 1 response where this was originally raised.
Input parameters	2, Table 1	6. Organic Carbon Partitioning Coefficient: There should be inputs of 2598 mL/g (average) for parent and 37.4 mL/g (average) for acid (Refer to EPA MRIDs 46190603 and 46190604
Input parameters	2, Table 1	7. Chemical Application Method, Incorporation depth and Application Date: There are apparent differences in model inputs (EPA vs. Syngenta),

Input parameters	2, Table 1	8. Application Rate: See above. Also please note that there was proposed a lower rate of 0.075 lb. ai/A in our Phase I comments.
Input parameters	3, Table 1	9. Aqueous photolysis Half-life: There should be an input of 6.02 days for parent.
Input parameters	3, Table 1	10. "Water Half-life": Per EPA guidelines, there should be an aerobic aquatic metabolism half-life input of 0.08 days for parent and 73.2 days for acid (Refer to EPA MRID 46190605). The hydrolysis half-life inputs should be 78 days for parent and "stable" for acid.
Input parameters	3, Table 1	11. "Soil Half-life": Per EPA guidelines, the inputs should be 0.47 days for parent and 16.4 days for acid. (Refer to EPA MRID 46190602).

Document: Fluazifop-P-butyl: Revised Acute and Chronic Dietary Exposure Assessments for the Tolerance Reassessment Eligibility Decision (TRED). PC Code 122809, DP Barcode DP Barcode: D310695.
Document Date: December 8, 2004.
Authors: Sherrie Kinard, (HED Chemist)

Header	**Page #, Paragraph***	**Comments**
Residue Data used for Acute, Chronic, and/or Cancer Assessments	6, Table 2	1. The drinking water input of 0.058 ppm appears to have been drawn from the Tier 1 drinking water assessment. Syngenta's Tier II drinking water exposure estimates provide lower values of 0.0087 ppm (acute) and 0.0031 ppm (chronic) than the EPA's Tier I modeling. Because there may be future additional uses proposed for this compound, Syngenta urges the Agency to utilize Tier II modeling results in the future.