



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MEMORANDUM

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Subject: Phase 2 Response to Error Comments for Fluometuron RED  
[PC Code 035503, DP Barcode 312652]

From: Elissa Reaves, Ph.D. Toxicologist/Risk Assessor  
Samuel Ary, Chemist  
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Health Effects Division (7509C)

*Elissa R* 2/1/05

Thru: Alan Nielsen, Branch Senior Scientist  
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*Alan Nielsen* 2/2/05

To: Kylie Rothwell, Chemical Review Manager  
Special Review Branch  
Special Review and Reregistration Division (7508C)

The Health Effects Division (HED) of the Environmental Protection Agency (EPA) has reviewed the error comments submitted by the technical registrant, Makhteshim Agan, on the Reregistration Eligibility Decision (RED) document for fluometuron. Error comments were addressed by Elissa Reaves, Samuel Ary, and Bill Smith. This document contains the HED's responses to error comments submitted by Makhteshim Agan.

**1. Comment: Page 2/¶2:** Fluometuron is a preplant, preemergence, and/or postemergence phenylurea manufactured by Agan Chemical Manufacturers. Ltd.

Registrant Notes: Micro-Flo has a technical registration (EPA Reg. No 51036-228) – probably a 100% repack; Platte/Loveland has a technical registration (EPA Reg. No. 34704-705), that is a 100% repack.

**HED Response:** Currently, there are three active registered fluometuron manufacturing-use products (MPs). Only Agan's Cotoran<sup>®</sup> Technical (EPA Reg. No. 11603-31) is subject to a reregistration eligibility decision. The other two manufacturing products are

repackaged and therefore not subject to a reregistration eligibility decision. This language has been included in the revised risk assessment.

**2. Comment: Page 2/¶3:** Sentence 3: “This reduction in use of fluometuron is likely due to available glyphosate resistant cotton.”

Registrant Notes: Spelling: glyphosate

**HED Response:** Spelling is corrected in the revised RED.

**3. Comment: Page 4: Sec III, Use Profile, ¶1, Sentence 2, :** “Broadleaf weeds controlled include: Buttonweed, Cocklebur, Florida pusley, Jimsonweed, ..., Prickly aids, ...Sebania....”

Registrant Notes: Spelling: Prickly sida, Sesbania

**HED Response:** Spelling is corrected in the revised RED.

**4. Comment: Page 4: Sec III, Use Profile, ¶2, Sentence 3:** “The commercial end products registered for use on cotton include...water-dispensible granules,...”

Registrant Notes: Spelling: water-dispersible granules

**HED Response:** Spelling is corrected in the revised RED.

**5. Page 5: Table 1, End-Use Product (EP) entry**

Registrant Notes: Add, at the beginning of the entry, the products “Meturon 4L, Meturon 80DF”

**HED Response:** These two products have been added to Table 1 of the revised RED.

**6. Page 5: Table 1, End-use Product (EP) entry:”...Drexel Creek™ Fluometuron + MSMA**

Registrant Notes: Spelling: Drexel Croak™ Fluometuron + MSMA

**HED Response:** Spelling is corrected in the revised RED.

**7. Page 6: Table 3: Lysine Conjugate of CGA-41685**

Registrant Notes: Structure should be included: [see Nov. 30, 2004 Document entitled “Fluometuron: Summary of Analytical Chemistry and Residue Data for the Reregistration Eligibility Decision (RED) Document” – structure is included in that document]

**HED Response:** This structure was included in the original risk assessment and is also included in Table 3 of the revised RED.

8. Page 19: Footnote 15, Sentence 2: "hydroxylated metabolites (CGA-236431, CGA-436432, CGA-13211, ...)

Registrant Notes: Correction- Change second metabolite to CGA-236432

**HED Response:** The second metabolite of footnote has been corrected to CGA-236432 in the revised RED.

9. Page 22/¶2: Sentence 4: "The para hydroxylated metabolites (CGA-236432, CGA-236432, CGA-13211, sulfate conjugates)..."

Registrant Notes: Correction- change first metabolite to CGA-236431

**HED Response:** The first metabolite is CGA-236431 in the revised RED.

10. Page 23/¶3: Sentence 3: "Fluometuron residues as the common moiety 3-trifluoromethylaniline can be determined..."

Registrant Notes: Spelling: trifluoromethylaniline

**HED Response:** Spelling is corrected in the revised RED.

11. Page 50, Table A2, Study/Guideline Entry 83-4, Results entry: Systemic LOAEL:...(and an increase in hemosiderin-laden macrophages)

Registrant Notes: Spelling: macrophages

**HED Response:** Spelling is corrected in the revised RED.

12. Page 59, Table B4, Summary of Fluometuron Commercial Grower Handler Cancer Risks.

Registrant Notes: NOTE: Should so many figures be highlighted in the 'Commercial Grower Cancer Risks' column? Don't the cancer risks shown in bold indicate lowest risk mitigation level that does not exceed HED's level of concern?

**HED Response:** Table B3 or B4 do should not contain highlighted data, these tables are updated in the revised risk assessment.