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January 13, 2004

Kylie Rothwell, Chemical Review Manager
U. S. Environmental Protection Agency
Ariel Rios Building (7508C)
1200 Pennsylvania Avenue, N.W.
Washington, DC 2040-0001

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RE: Fluometuron
Health Effect Division Science Chapter

Dear Ms. Rothwell:

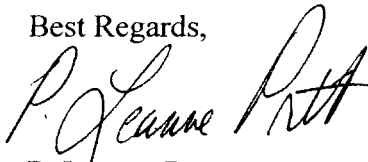
Enclosed, please find Makhteshim Agan's review of the Agency's HED Fluometuron Draft Science Chapter. As requested in Michael Goodis's letter to Andy Eimanis, the chapter was reviewed for mathematical, computational and typographical errors. A summary chart is attached noting errata, corrections and comments.

Please note that this chapter has not been reviewed by an environmental toxicologist, so the corrections noted should not be construed as our final comments on the HED Chapter. Makhteshim has reviewed the document for confidential business information (CBI), and finds nothing that is claimed as CBI.

Finally, please note that I have recently been notified of fluometuron studies that were completed for the EU. I have begun to look over that list to see if any of the studies fulfill existing data gaps, or would be of interest to EPA. Once that determination has been made, EPA will be notified

If you have any questions or concerns regarding these comments, please feel free to contact me at your convenience.

Best Regards,



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FLUOMETURON
HED SCIENCE CHAPTER: ERRATA AND CORRECTIONS / COMMENTS

PAGE	PASSAGE	CORRECTION / NOTES
2, ¶2	"Fluometuron is a preplant, preemergence, and/or postemergence phenylurea herbicide manufactured by Agan Chemical Manufacturers, Ltd."	NOTE: 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
2, ¶3,	Sentence 3: "This reduction in use of fluometuron is likely due to available glyphosate resistant cotton."	Spelling: glyphosate
4	Sec III, Use Profile, ¶1, Sentence 2: "Broadleaf weeds controlled include: Buttonweed, Cocklebur, Florida pusley, Jimsonweed, Prickly aids, Seebania,"	Spelling: Prickly sida, Sesbania
4	Sec III, Use Profile, ¶2, Sentence 3: "The commercial end products registered for use on cotton include . . . water-dispersible granules, . . ."	Spelling: water-dispersible granules
5	Table 1, End-use Product (EP) entry	Add, at the beginning of the entry, the products "Meturon 4L, Meturon 80 DF"
5	Table 1, End-use Product (EP) entry: ". . . Drexel Creek™ Fluometuron + MSMA	Spelling: Drexel Croak™ Fluometuron + MSMA
6	Table 3: Lysine Conjugate of CGA-41685	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]
19	Footnote 15, Sentence 2: "hydroxylated metabolites (CGA-236431, CGA-436432, CGA-13211, . . .)	Correction – Change second metabolite to CGA-236432
22, ¶2	Sentence 4: "The para hydroxylated metabolites (CGA-236432, CGA-236432, CGA-13211, sulfate conjugates)"	Correction – change first metabolite to CGA-236431
23, ¶3	Sentence 3: "Fluometuron residues as the common moiety 3-trifluoromethylaniline can be determined"	Spelling: trifluoromethylaniline
50	Table A2, Study / Guideline Entry 83-4, Results entry: "Systemic LOAEL: . . . (. . . and an increase in hemosiderin-laden macrophages)	Spelling: macrophages
59	Table B4, Summary of Fluometuron Commercial Grower Handler Cancer Risks	NOTE: Should so many figures be highlighted in the 'Commercial Grower Cancer Risks' columns? Don't the cancer risks shown in bold indicate lowest risk mitigation level that does not exceed HED's level of concern?

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