THE COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS



Department of Agricultural Resources

251 Causeway Street, Suite 500, Boston, MA 02114 617-626-1700 fax: 617-626-1850 www.mass.gov/agr



IMAZAPYR

In addition to the review that is presented below, comprehensive reviews are available from U.S. EPA and USDA Forest Service that incorporate more recent studies and data. The US Forest Service risk assessment report is available at the U.S. FOREST SERVICE webpage, Pesticide-Use Risk Assessments and Worksheets:

https://www.fs.fed.us/foresthealth/protecting-forest/integrated-pest-management/pesticide-management/pesticide-risk-assessments.shtml

Imazapyr Registration Review documents are available at www.regulations.gov in docket ID: EPA-HQ-OPP-2014-0200

Review conducted by MDAR and MassDEP for use in Sensitive Areas of Rights-of-Way in Massachusetts

Common Trade Name(s): Arsenal

Chemical Name: Imazapyr: 2-(4-isopropyl-4-methyl--5-oxy-2-imidazolin-2-yl) nicotinic acid with isopropyl amine

(2) CAS No.: 81510-83-0

GENERAL INFORMATION

Imazapyr is effective against and provides residual control of a wide variety of annual and perennial weeds, deciduous trees, vines and brambles in non—cropland situations. It also provides residual control and may be applied either pre or postemergence. Postemergence is the preferred method especially for the control of perennial species. Imazapyr is readily absorbed by the foliage and from soil by the root systems. Imazapyr kills plants by inhibiting the production of an enzyme, required in the biosynthesis of certain amino acids, which is unique to plants (10, 100).

ENVIRONMENTAL FATE

Mobility

There are few studies which have investigated the mobility of Imazapyr in soil, but available reports indicate that Imazapyr does not leach and is strongly absorbed to soil (100). Imazapyr has a high water solubility (1 - 1.5%) which could generally indicate a high leaching potential, but as with other organic acids Imazapyr is much less mobile than would normally be expected (100). No soil partition coefficients have been reported, but they may be expected to be quite high (100).

One field study investigated Imazapyr mobility in a sandy loam soil (0.9% organic matter, 8.0% clay; 38.8% silt). Imazapyr did not leach below the 18—21 inch layer after 634 days and 49.6 inches of rain. The levels found below the 12 inch layer were just above the 5 ppb detection limit. In addition, this study investigated the off—target mobility of Imazapyr and found no residues further than 3 inches from the sprayed area after 1 year (102).

Although low levels of Imazapyr did move to the 18 to 21 inch layer this was only after nearly 2 years and fifty inches of rain. This indicates that imazapyr is relatively non-mobile and does not leach through the soil profile. Imazapyr remains near the soil surface and heavy precipitation may cause some off target movement from surface erosion of treated soils.

Persistence

The main route of Imazapyr degradation is photolysis. In a study of photodegradation in water, the half—life of Imazapyr was calculated as 3.7, 5.3 and 2.5 days in distilled water, pH 5 and pH 9 buffers respectively (101). A soil photolysis study for Arsenal on sandy loam calculated a half—life of 149 days (101).

Studies have investigated the persistence of Imazapyr in soil under aerobic and anaerobic conditions. The half-life of Imazapyr in soil has been reported as varying from 3 months to 2 years (100). A laboratory study found the half-life to be 17 months (101). Detectable residues were found in a field study in all soil layers to 21 inches at 634 days (102). Vegetation was sprayed with radio-labelled Imazapyr at a rate of 1 lb. a.i./acre. The soil was a sandy loam (0.9% organic matter) which received 49.6 inches of rain during 634 days. The highest level of radioactivity (0.234 ppm Imazapyr) was found in the top 3 inches of soil at 231 days after application and there were detectable levels in the 9-12 inch layer. The concentrations in the top layer increased steadily from day 4 to 231 when they reached their maximum (0.234 ppm) and then declined. At day 634 the level in the top layer (0-3 inch) was 0.104 ppm (102). These data indicate that Imazapyr is persistent in soil and, most importantly, that Imazapyr is translocated within plants from the plant shoots back to the roots and released back into soil. Very little of the Imazapyr actually reached the soil during application. The soil residues may be due to the decay of plant material containing Imazapyr in the soil (102).

TOXICITY REVIEW

Acute (Mammalian)

The acute oral LD5O in both male and female rats was greater than 5000 mg/kg using technical Imazapyr. The acute dermal LD5O in male and female rabbits was greater than 2000 mg/kg. The compound was irritating to the rabbit eye but recovery was noted 7 days after application of 100 mg of the test substance. It was classified as mildly irritating to the rabbit skin following application of 0.5 grams of the material on abraded or intact skin (103).

Arsenal product formulation was tested in a similar battery of tests. The rat oral LD5O value was greater than 5000 mg/kg and the rabbit dermal LD5O was greater than 2148 mg/kg. The irritation was observed following installation of 0.5 ml of the test substance in the skin study and 0.1 ml in the eye study (104).

Technical Imazapyr was administered to rats as an aerosol for four hours at a concentration of 5.1 mg/L. There were ten rats per sex and the animals were observed for 14 days after treatment before they were sacrificed. Slight nasal discharge was seen in all rats on day one but disappeared on day two (105).

The inhalation LC5O is greater than 5.0 mg/L for both the formulation and the technical product (105,106). Technical Imazapyr was applied dermally at the following dosages: 0, 100, 200 and 400 mg/kg/day (109). Arsenal was used at 0, 25, 50 and 100% of the formulated solution in sterile saline. Each dose group consisted of 10 male and 10 female rabbits and the test substance was applied to either intact or abraded skin and occluded for 6 hours each day.

The result of the dermal studies with Imazapyr as well as Arsenal were non remarkable with regard to body weights, food consumption, hematology, serum chemistry, clinical observations, necropsy observations and histopathology. It was noted that Arsenal, undiluted, was locally irritating (109).

<u>Subchronic and Chronic Studies (Mammalian)</u> In the subchronic tests a NOEL for systemic toxicity with dermal administration in rabbits was 400 mg/kg/d (2,109). After dietary administration for 13 weeks in the rat, there was no effect at 10,000 ppm

(571. mg/kg/d) which was the highest dose tested (141).

A bioassay is currently underway to evaluate the potential oncogenicity of technical Imazapyr. Groups of 65 rats per sex per dose group have received 0, 1000, 5000 or 10,000 ppm in the diet. Hematology, clinical chemistry and urinalysis tests were conducted at 3, 6 and 12 months and will also be done at 18 months and at study termination. At the 12 month sacrifice the only effect noted was a slight increase in mean food consumption in all treated female groups. Most of the increases were statistically significant, but they did not always exhibit a dose response. The oncogenicity test is due to be submitted to the EPA in the spring of 1989 (115).

Oncogenicity Studies

Chronic bioassays as discussed in the subchronic/chronic section are underway.

Mutagenicity Testing

Five different bacterial strains of <u>Salmonella typhimurium</u> (TA1535, TA98, TA1OO, TA1537, and TA1538) and one of <u>Escherichia coli</u> (WP-2 uvrA-) were used to evaluate the mutagenicity of Imazapyr. It is unclear whether the compound used was technical or formulated Imazapyr. Dose levels up to 5000 micrograms/plate were used and each strain was evaluated both in the presence or absence of PCB— induced rat liver 5—9 microsomes. Negative results were noted in all assays. The six tester strains were designed to detect either base-pair substitutions or frameshift mutations (113).

<u>Developmental Studies (Mammalian)</u>

Two teratology studies have been done and both of these studies evaluated technical Imazapyr. One study used rats as the test species and the other utilized rabbits (111,112).

Pregnant rats received dosages of 0, 100, 300 or 1000 mg/kg/d of Imazapyr during days 6—15 of gestation. There were 22 rats in the control group and 24, 23 and 22 in the low, mid and high dose groups. All doses were administered orally by gavage. Salivation was noted only during the dosing period in 6 of the 22 females in the highest dose group (1000 mg/kg). No other adverse observations were noted in the treated dams (111). Fetal body weight and crown-rump length data for the treated groups were comparable to controls. Fetal development (external, skeletal and visceral) "revealed no aberrant structural changes which appeared to be the result of the exposure to Imazapyr" (111). The NOEL for maternal toxicity was 300 mg/kg and the NOEL for teratogenicity and fetoxicity was 1000 mg/kg (116).

Four groups of 18 pregnant rabbits were exposed on days 6-18 of gestation to doses of 0, 25, 100, 400 mg/kg/d Imazapyr. There was no statistically significant difference between control and treated groups at any dose (112).

Avian

Acute oral LD5Os of Imazapyr in bobwhite quail and mallard duck were 2150 mg/kg. The 8 day dietary LC5O in the bobwhite quail and mallard duck were greater than 5000 ppm (101).

<u>Invertebrates</u>

The dermal honey bee LD5O for Imazapyr is greater than 100 mg/bee (101). The LD5O (48 hr) was greater than 100 mg/L for the water flea (100).

Aquatic The LC50s of Imazapyr in the rainbow trout, bluegill sunfish and channel catfish were greater than 100 mg/L (101).

<u>SUMMARY</u> Imazapyr is a relatively immobile herbicide in the soil profile even when used in sandy and low organic content soils. It is also persistent in soils. The low mobility and persistence may result in off-target movement of Imazapyr from surface erosion of treated soils.

The atypical soil—plant flux characteristics of Imazapyr and delayed maximum soil concentrations indicate that repeated annual applications may result in build—up of Imazapyr in soil. Consequently, an interval is required to allow for the degradation of soil residues before a repeated application is made.

The oral LD5O of Imazapyr in rats is greater than 5000 mg/kg and the derrnal LD5O is greater than 2000 mg/kg in rabbits. The oncogenicity bioassay is currently underway and the only effect reported in the interim study was an increase in food consumption in the treated females. No mutagenic effects were observed.

The acute oral LD5Os of Imazapyr and the Arsenal formulation are greater than 5000 mg/kg. In the subchronic 13 week rat study there was no effect observed at the highest dose tested 10,000 ppm. The oncogenicity study is currently underway.

<u>REFERENCES</u>

- 2. <u>Farm Chemicals Handbook</u>: 1985 Dictionary, buyer's guide to trade names and equipment. Pub. by Meister Pub. Co.
- 1. American Cyanamid Arsenal Herbicide Environmental and Toxicological Data Summary.
- 2. AC 243,997 [2—(4-isopropyl-4—methyl-5-oxo-2-imidazolin-2-71)nicotinic acid): Weed & Soil Metabolism in a field plot. American Cyanamid Company, POM Vol. 23-32. 1986 (Confidential Information).
- 3. Acute Toxicology of AC 243,997 to Rats and Rabbits. American Cyanamid Company, A83-24.
- 4. Acute Toxicology of AC 252,925 22.6% to Rats and Rabbits. American Cyanamid Company, A83-67.
- 5. Acute Inhalation Toxicity of AC 243,997 in Sprague-Dawley Rats. Food and Drug Research Laboratories, Inc. Study No. 7624.
- 6. Acute Inhalation Toxicity of AC 252,925 in Sprague-Dawley Rats. Food and Drug Research Laboratories, Inc. Study No. 7607.
- 7. Evaluation of the Sensitization Potential of AC 243,997 in Guinea Pigs. Toxicology Pathology Services, Inc. Study No. 186A—201-231-83.
- 8. Evaluation of the Sensitization Potential of AC 252,925 in Guinea Pigs. Toxicology Pathology Services, Inc. Study No. 186A—201-231-83.
- 9. Twenty-one Day Dermal Toxicity Study with AC 243,997 in Rabbits. Toxicology Pathology Services, Inc. Study No. 186B—301-230-83.
- 10. Twenty—one Day Dermal Toxicity Study with AC 252,925 in Rabbits. Toxicology Pathology Services, Inc. Study No. 187B-230-83.
- 11. Teratology Study in Albino Rats with AC 243,997. ToxiGenics Study No. 450-1222.
- 12. Teratology Study in Albino Rabbits with Ac 243,997. ToxiGenics Study No. 450-1224.
- 13. Bacterial/Microsome Reverse Mutation (Ames) Test on CL 243,997. American Cyanamid Company GTOX Volume 3, Number 13.
- 14. Herbicide AC 243,997: The Absorption, Excretion, Tissue Residues and Metabolism of Carboxyl Carbon—14 Labeled AC 243,997 Nicotinic acid, 2-(4—isopropyl—4-methyl—5—oxo—2-imidzolin—2yl) in the Rat. American C~anamid Company Report No. PD-M Volume 20—3.