



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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

November 20, 1991

MEMORANDUM

**SUBJECT: DACTHAL W-75 HERBICIDE, EPA REG. NO. 50534-1
ADD GROUND-WATER ADVISORY STATEMENT**
Amendment of November 4, 1991

FROM: Henry Jacoby, Chief
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)

TO: Frank Sanders, Chief
Herbicide-Fungicide Branch
Registration Division (H7506C)

ISK-BIOTECH has submitted a proposed labeling statement for Dacthal W-75 Herbicide intended to advise users about the chemical's potential to contaminate ground water. The proposed advisory is a modification of our proposed language.

BACKGROUND: In our review of June 5, 1991, EFGWB suggested the following ground-water advisory should be added to the products containing dacthal:

"Tetrachloroterephthalic acid, a breakdown product of dacthal, is known to leach through soil, and has been found in ground water as a result of agricultural use. Users are advised not to apply in areas where soils are permeable, particularly where ground water is used for drinking water. Consult with the pesticide state lead agency for information regarding soil permeability and aquifer vulnerability in your area."

In an amendment of July 16, 1991, ISK-BIOTECH proposed to add the following ground-water advisory to the subject product's labeling:

"Tetrachloroterephthalic acid, a breakdown product of dacthal, is known to leach through soil, and has been found in ground water as a result of agricultural use. Users are advised not to apply Dacthal to sand and loamy sand soils where the water table (groundwater), used for drinking water, is close to the surface and where these



soils are very permeable, i.e. well drained. Your local agricultural agencies can provide further information on the type of soil in your area and the location of ground water used for drinking water.

In EFGWB's review of August 5, 1991, it was indicated that ISK Biotech's proposed language would be acceptable with the following changes:

a. The first sentence must be revised to read " Tetrachloroterephthalic acid, a breakdown product of dacthal, is known to leach through soil as a result of agricultural uses and has been found in ground water which may be used for drinking water.

b. In the second sentence, delete the phrase, "used for drinking water."

EFGWB prefers "Consult with the pesticide lead agency ... aquifer vulnerability in your area." over ISK Biotech's (atrazine) statement. ISK Biotech should be made aware that OPP is in the process of developing a ground-water advisory policy which may make EFGWB's preferred language mandatory.

PROPOSED GROUND-WATER ADVISORY: ISK-BIOTECH's proposed labeling is as follows:

Groundwater Advisory "Tetrachloroterephthalic acid, a breakdown product of dacthal, is known to leach through soil as a result of agricultural and turf uses and has been found in groundwater which may be used for drinking water. Users are advised not to apply Dacthal to sand and loamy sand soils where the water table (groundwater) is close to the surface and where these soils are very permeable, i.e. well drained. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater used for drinking water.

CONCLUSION: The proposed labeling is acceptable.

RECOMMENDATION: ISK Biotech should be made aware that, although the proposed labeling is acceptable, EFGWB prefers "Consult with the pesticide lead agency ... aquifer vulnerability in your area." over ISK Biotech's last sentence in their advisory.

cc: J. Mayes
B. Behl
J. Wolf