



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

DATE: July 16, 1999

SUBJECT: Review of Established Soybean Irrigation Studies for Isoxaflutole
(Chemical # 123000; DP Bar Code D257679)

TO: Joanne Miller (PM team #23)
Herbicide Branch
Registration Division (7505C)

FROM: Michael Davy, Agronomist
Environmental Risk Branch 2
Environmental Fate and Effects Division (7507C)

A handwritten signature in cursive script that reads "Michael Davy".

THROUGH: Patricia Jennings, Acting Branch Chief
ERB2/EFED (7507C)

A handwritten signature in cursive script that reads "Patricia Jennings".

8/3/99

EFED has reviewed non-target plant field study submitted by Rhone Poulenc. This study is titled *Established Soybean Irrigated With Water Containing RPA 202248*, MRID 448397-06. The study was not a part of the required data set for the conditional registration of Isoxaflutole.

EFED has considered this study to be an invalid study and not useful for risk assessment purposes for the following reasons:

1. The control plots should be protected from any potential contamination from drift or runoff from the adjacent treated plots. No indications were given that precautions (adequate distance from treated sites, shallow ditch to divert potential contaminated runoff water, and adequate precautions against potential drift) were taken. The integrity of the control plots is questioned.

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2. No plant samples were taken of the control to measure Isoxaflutole and its degradates for possible contamination after treated sites were applied.
3. Approximately 25% of the low dose and 7% of the high dose application were applied to the control plots. The negative control plots were contaminated with Isoxaflutole.

If you have any questions, please do not hesitate to contact Michael Davy at 305-7081.