



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

December 2, 1998

MEMORANDUM:**SUBJECT:** Isoxaflutole Ground Water Study Protocols**TO:** Daniel Kenny, PM Team Reviewer
Registration Division (7505C)**FROM:** David Wells, Hydrologist
Environmental Fate and Effects Division (7507C) *DW***Thru:** Betsy Grim, Acting Chief *Betsy Grim 12-2-98*
Environmental Risk Branch II (7507C)

Rhone-Poulenc has informally submitted protocols for the two small-scale prospective ground water studies to be conducted with the new corn herbicide isoxaflutole (Balance). The preliminary site selection for the studies was completed in September and two sites were chosen, one in Iowa and one in Nebraska. These documents provided details on how the studies are to be conducted. In addition to the protocols, Rhone-Poulenc has requested to waive the requirement to dig soil pits to expose the soil profile.

Generally, the protocols were well written and will provide data as recommended in the newly proposed study guidelines. We agree to waive the need for soil pits for these study sites since this issue has not been resolved and is one of many issues that will be discussed in the upcoming Scientific Review Panel meeting on the ground water study guidelines. It is likely that soil pits will be required in the future and could be required in future studies for isoxaflutole. In addition, because of the shallow ground water, we agree with the proposal by Rhone-Poulenc to modify the number of lysimeters and wells in each monitoring clusters for these studies.

A major issue with the proposed protocols is that Rhone-Poulenc wants to conduct the site characterization at the same time it is installing monitoring equipment. The soil sample bore holes would be immediately reused for installation of the monitoring wells. Typically, when conducting these studies, a series of soil and water samples are collected from the site to fully characterize it before monitoring equipment is installed. Because of the short time frame, there is a need to install the monitoring equipment as soon as possible before winter. It will also provide a considerable savings of time and money. We have serious concerns about doing this without having detailed data from the sites and therefore do not approve the protocol at this time.



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If Rhone-Poulenc has a high confidence in the sites and chooses to continue and install the monitoring equipment at the same time it collects samples for the site characterization, it will be at their own risk. If the soils at the site are found to be highly variable in nature, have impeding layers, or for any reason the site is later determined to be unacceptable, it could require serious modifications of the study. Modifications could include installing additional monitoring equipment or even selection of a new study site.

David Wells, Hydrologist

Addendum: Rhone-Poulenc has verbally agreed to "accept the risk" and is continuing with site preparation as they proposed.

2