



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

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

PC Code: 123000, Isoxaflutole
Case No.: 046754

DPBarcode:D254093

25 March 1999

MEMORANDUM:

SUBJECT: Revised tile drain "grab" monitoring protocol.

FROM: Ian Kennedy, Hydrologist, *Ian Kennedy 3-25-99*
Environmental Risk Branch II

THRU: *Betsy Griffin 3-26-99*
Elizabeth Leovey, Branch Chief
ERBII/EFED (7507C)

TO: Daniel Kenny, PM Team Reviewer
Registration Division (7505C)

Summary: EFED has several comments on the current state of the tile drain grab sample study protocol. At a minimum, we recommend modifications to reflect the use of a tracer, better quality assurance on the filter paper disks used to verify chemical application, records of ponding on the soil surface after rainfall and two additional background samples. We would also like to be assured that weather data are measured close as possible to each study site. Quarterly reports should also be submitted so EFED can track the progress of the study.

As agreed in our meeting of 16 March with Rhône-Poulenc, a tracer should be applied to each test plot, and this procedure should be added to the protocol. Naturally, all samples should be analyzed for the tracer as well as for Isoxaflutole and its degradates. Measurement of background concentrations are needed before the tracer is applied.

The filter paper discs used to verify application are to be transported to the lab in polyethylene containers, but the nature of these containers is not specified in the protocol. It would be consistent to store and transport the filter paper disks in the same jars used for the water samples. It would also be helpful if filter paper discs spiked with a known quantity of isoxaflutole were used for quality assurance. This should apply to the more detailed tile drain studies, PGW studies and runoff studies as well. The metal pans used to hold the filter paper in the field should be no

larger than the filter paper disks themselves to prevent the paper from soaking up more spray fluid than covered its surface area. When wetting the filter paper disks prior to placing them in the pans, care should be taken to insure the filter paper is not so wet as to prevent it from absorbing the herbicide spray.

A single preapplication sample from each sampling location is insufficient. EFED recommends at least three such samples be taken from each site.

At sampling periods following wet weather, we recommend some notation in the records about the presence or absence of ponding on the surface of the plots. Any local depressions in the neighborhood of each tile line on the plot should be identified prior to corn planting so areas likely to pond can be monitored later.

Because of the high spatial variability of precipitation, EFED recommends on-site instrumentation for weather monitoring. If off-site instrumentation is used, the weather station should be no more than ½ mile from the experimental site. Weather stations will be needed for the more detailed PGW and tile drain studies to be conducted later. Irrigation records are not needed for the grab sample study unless the plots are irrigated.

Finally, the protocol states that a final report will be submitted, but makes no mention of quarterly reports. EFED would like to see quarterly reports so that we may monitor the progress of the study.

DP BARCODE: D254093

CASE: 046754
SUBMISSION: S558197

DATA PACKAGE RECORD
BEAN SHEET

DATE: 03/25/99
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 576 RESUBMISSION
RANKING : 0 POINTS ()
CHEMICALS: 123000 Isoxaflutole 98.0000%

ID#: 000264-00566 TECHNICAL ISOXAFLUTOLE
COMPANY: 000264 RHONE-POULENC AG COMPANY
PRODUCT MANAGER: 23 JOANNE MILLER 703-305-6224 ROOM: CM2 237
PM TEAM REVIEWER: DANIEL KENNY 703-305-7546 ROOM: CM2 227
RECEIVED DATE: 03/15/99 DUE OUT DATE: 07/03/99

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 254093 EXPEDITE: N DATE SENT: 03/12/99 DATE RET.: / /
CHEMICAL: 123000 Isoxaflutole
DP TYPE: 001 Submission Related Data Package

CSF: N LABEL: N
ASSIGNED TO DATE IN DATE OUT ADMIN DUE DATE: 05/21/99
DIV : EFED 03/12/99 / / NEGOT DATE: / /
BRAN: ERB2 03/12/99 03/25/99 PROJ DATE: / /
SECT: IO 03/12/99 03/25/99
REVR : BGRIM 03/12/99 03/25/99
CONTR: IKENNEDY 03/12/99 03/25/99

* * * DATA REVIEW INSTRUCTIONS * * *

Attention: Ian Kennedy

The forwarded information has been submitted as R-P's response to our request for modifications the the monitoring protocol for the tile drain "grab" samples for isoxaflutole. This submission is in response to a review by David Wells in January, 1999. Please review the protocol to determine if it is now acceptable. Thanks.

-Dan Kenny 305-7546

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

| DP BC | BRANCH/SECTION | DATE OUT | DUE BACK | INS | CSF | LABEL |
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