



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

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

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3 May 1999

MEMORANDUM:

SUBJECT: Notes on March 16th meeting on isoxaflutole water studies.

FROM: Ian Kennedy, Hydrologist,
Environmental Risk Branch II

Ian Kennedy 5/7/99

THRU: Pat Jennings, Acting Branch Chief
ERBII/EFED (7507C)

Pat Jennings 5/7/99

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

Summary: EFED wants to have two prospective groundwater studies on vulnerable soils and two on tile-drained sites and does not want one tile drain study replaced with a PGW study on "typical" soil.

Rhône-Poulenc sent to EFED some notes on a meeting to discuss tile drain monitoring studies in support of the registration of isoxaflutole. Of the several points in the memo, EFED can comment on the following:

5 a. Rhône-Poulenc requested some guidance for selecting sites for the detailed tile drain studies (the "prospective groundwater studies with tile drains"). These sites should be in locations with <2% slope over the entire study area with a flat or concave topography. They should have a permanently high water table near the level of the tile drains and the drains themselves should be closely spaced. Organic matter contents should be as low as possible, but do not necessarily have to be as low as for a prospective groundwater study. We recommend conservation tillage and good soil structure at the site.

5 b. EFED had previously informed Rhône-Poulenc of the potential risks involved with installing monitoring equipment before final site approval. We recommend that two PGW studies are

needed on vulnerable soils, as described in the PGW guidance, and that two studies are needed at tile drained sites. These locations probably won't coincide.

6 b. Rhône-Poulenc has proposed defining *significant flow* as “detection of the tracer within 2 months of the application of the test material.” EFED does not consider this to be a definition of flow. We would like to see continuous flow from the drain pipe seven weeks after application of isoxaflutole, or at least a significant flow from the drain pipe following a rainstorm at two months into the study.