



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

OFFICE OF  
PREVENTION,  
PESTICIDES, AND  
TOXIC  
SUBSTANCES

Shaughnessy No: 123000  
DP Barcode: D236564

MEMORANDUM

9-30-98

**SUBJECT:** Response to 6/6/97 Rhone-Poulenc Rebuttal for Isoxaflutole.

**TO:** Joanne Miller, PM 23  
Registration Division (7505C)

**FROM:** James Breithaupt, Agronomist *JS*  
Environmental Risk Branch II  
Environmental Fate and Effects Division (7507C)

**THRU:** Elizabeth Leovey, Branch Chief *JS*  
Environmental Risk Branch II  
Environmental Fate and Effects Division (7507C)

EFED is responding to the Rhone Poulenc rebuttal dated 6/6/97. This rebuttal was in response to the Section 3 review of isoxaflutole.

The registrant is proposing to lower the maximum application rate from 0.1875 to 0.14 lbs ai/A. The impact of this reduction in use rate on EEC's from PRZM-EXAMS and SCI-GROW was addressed in DP Barcode D239344, dated 2/26/98. In the 2/26/98 memo, EFED addressed the change in application rate and different half-lives of RPA 202248 in aerobic soil.

The registrant is proposing to conduct a quarterly monitoring program for irrigation wells located in treated areas. Sampling on a quarterly basis is inadequate since peak values would likely be missed. A monitoring program with sampling intervals at closer intervals would be required.

The registrant is proposing ground water, surface water, and irrigated water advisory statements to the product label. The registrant is also proposing spray drift management advisory statements and a restriction from application by chemigation and aerial application techniques. EFED does not believe that these labeling restrictions will reduce the phytotoxic risk below our

level of concern.

The registrant conducted PRZM-EXAMS modeling on parent isoxaflutole, RPA 202248, and RPA 203328 (MRID 43988201). The registrant is correct in noting that the values for parent isoxaflutole and RPA 202248 were very similar. However, the registrant and EFED did not achieve similar results when modeling the secondary degradate, RPA 203328. In the modeling, the registrant provided half-lives for RPA 203328 from hydrolysis. There was no scientific basis for hydrolytic degradation, since no RPA 203328 was formed in the study. The registrant also used "special cards" to calibrate the modeling to aerobic soil metabolism studies. This assumes that no further formation of RPA 203328 occurred from degradation of RPA 202248 after 40 days, when in fact, formation of RPA 203328 was continuing at a slower rate than degradation. This is not consistent with normal EFED modeling practices.