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EAB Log Out Date: JUN 12 1987

Pick # 11391

To: Bob Taylor
Product Manager 25
Registration Division (TS-767)

From: Carolyn K. Offutt *Carolyn K. Offutt*
Chief, Environmental Processes and Guidelines Section
Exposure Assessment Branch, HED (TS-769)

Attached, please find the exposure assessment review of:

Reg./File No.: 524-316

Chemical: Alachlor

Type Product: Herbicide

Product Name: Lasso

Company Name: Monsanto

Submission Purposes: Review of Monsanto's May 9, 1985,

letter in reply to EPA's questions on alachlor surface

water monitoring program

Action Code: 495

Date In: 8/5/85

EFB#: 50828

Date Completed: 6/12/87

Review Time 1 Days

Monitoring study requested: X

Monitoring study voluntarily

Deferrals To:

 Ecological Effects Branch

 Residue Chemistry Branch

 Toxicology Branch

(1)

REVIEW OF MONSANTO MAY 9, 1985, LETTER

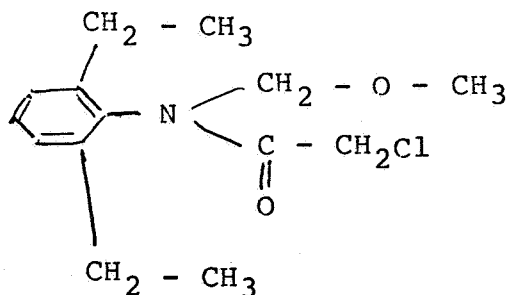
1. CHEMICAL:

Chemical name: 2-Chloro-2'6'diethyl-N-(methoxymethyl)-acetanilide

Common name: Alachlor

Trade name: Lasso

Structure:



2. TEST MATERIAL:

Not applicable

3. STUDY/ACTION TYPE:

Review of Monsanto's May 9, 1985, letter replying to EPA's questions on alachlor surface water monitoring program.

4. STUDY IDENTIFICATION:

Title: May 9, 1985, letter to Director, Registration Division, Office of Pesticide Programs

Author: Frank S. Serdy, Manager
Federal and State Registration Affairs
Monsanto Agricultural Products Company
700 Chesterfield Village Parkway
St. Louis, MO 63198

Issue Date: 8/5/85

Accession No: NA

5. REVIEWED BY:

Carolyn K. Offutt, Chief
Environmental Processes and Guidelines Section/EAB/HED

Carolyn K. Offutt Date 6/12/87

6. APPROVED BY:

Carolyn Offutt, Chief
Environmental Processes and Guidelines Section/EAB/HED

Carolyn K. Offutt Date 6/12/87

7. CONCLUSIONS:

- a. An annual report is essential. Submission of interim results of residues of alachlor in drinking water is required.
- b. The date of June 1986 is acceptable for submission of a final report for the 1985 monitoring program.
- c. Information of alachlor residues in drinking water "regarding unreasonable adverse effects on the environment" must be reported to the Agency under Section 6(a)(2) of FIFRA.
- d. Agency review of use data on a county or smaller level is necessary to establish the validity of the design of the monitoring program.

8. RECOMMENDATIONS:

The information in this review should be provided to the registrant. The registrant should provide the use data. (Use data was received in July and September 1986.)

9. BACKGROUND:

The Office of Pesticide Programs had several meetings during Spring 1985 with representatives of Monsanto to discuss how Monsanto would fulfill the requirements in the November 1984 Alachlor Registration Standard for monitoring ground and surface waters for alachlor residues. Monsanto summarized in the May 9, 1985, letter some of the questions which OPP had raised, as follows:

1. How frequently would we [Monsanto] make reports available to OPP and ODW?
2. A suggested date for a final report?
3. A level of contamination of concern, one which we [Monsanto] would report to the Agency?
4. Will we [Monsanto] send the Lasso Market Share data to the EPA?

10. DISCUSSION

Regarding the questions:

1. The Monsanto response indicated that they intended to submit only an annual report and no interim reports. Certainly a final report summarizing the monitoring on an annual basis is essential. Our interest, now as then, is to ensure that information is provided to EPA and the states on a timely basis

of residues of pesticides in drinking water, which may cause unreasonable adverse effects to people consuming that water.

2. The suggested completion date of June 1986 was acceptable for a final report covering the monitoring program from March 1985 to March 1986.

3. We agree that the purpose of the program is to develop an estimated annual exposure value and that the time from sampling to analysis with validated results may be as long as 6 to 8 weeks. However, the registrant has the responsibility under Section 6(a)(2) of FIFRA to report "information regarding unreasonable adverse effects on the environment." We think that reporting is necessary of interim results which indicate that residues of alachlor are in drinking water and we do not set a level for reporting.

4. We continue to maintain that data indicating where alachlor is used on a county or smaller level is necessary to assess the validity of the design of a monitoring program.

11. ONE-LINER

NA

12. CBI APPENDIX

NA