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

February 26, 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

TO: Robert Taylor, PM 25
Registration Division (TS-767-C)

SUBJECT: Monsanto's Monitoring Protocol for Alachlor

EAB staff have rapidly reviewed Monsanto's protocol for surface and ground water monitoring studies, which we received on February 19. On February 21, we met with Monsanto personnel to discuss the protocol and to request answers to numerous questions that we had. These questions focused mostly on the surface water portion of the study, since Stu Cohen, who has been covering the ground water portion, was on travel in Hawaii.

The protocol in general is much better and more complete than the previous version dated January 25, 1985. Subject to Stu Cohen's review and the answers to our questions, it appears to be acceptable. We have sent a written list of questions to Monsanto (copy attached).

Our most important question relates to alachlor usage data. The counties where monitoring is to take place were selected based on usage data which classified all counties into high, medium, and low use categories. Monsanto has not submitted these usage data, although we requested the data in the letter to Monsanto on February 5. Without these data and the associated criterion which divides the counties into high, medium, and low use areas, we cannot verify that the monitoring sites selected in fact represent a reasonable mix of high and medium use counties.

We believe that it is imperative for HED and BUD to review the usage data, and would like you to request Monsanto to submit these data promptly.

David J. Severn, Chief
Exposure Assessment Branch

Attachment

cc: Diane Ierley, RD

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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Samuel Dubelman
Technology Division
Monsanto Agricultural Products Co.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167

Dear Dr. Dubelman:

The data on Public Water Supplies which you requested have been sent to you under separate cover. The materials included:

(a) The Inventory of Public Water Supplies in the United States and its Territories encoded on magnetic tape at a density of 6250 bpi.

(b) The tape tile parameters for use in unloading the reels.

(c) A COBOL language file definition for use by computer systems personnel in extracting specific data elements.

(d) A Federal Reporting Data System (FRDS) Appendix containing field definitions and tables of code values.

The data were prepared from the FRDS fiscal 1983 data base. Information in FRDS is supplied by those States or EPA Regions who have responsibility for the Safe Drinking Water programs. The information is furnished to EPA in compliance with the annual reporting requirements under the Safe Drinking Water Act. The accuracy of all of the information in the FRDS data base is dependent upon the quality of information received from the States or EPA Regions who have responsibility for the safe drinking water program in a particular state or territory.

The states report public water supply inventories to EPA in order by the state-assigned public water supply indentifier. This has the effect of clustering the public water supplies based upon how the state assigned the public water supply identifier.

The effect of this clustering can be considerably reduced by changing the order of the public water supplies. This is accomplished by sorting the public water supplies based upon population served (PWS-POP-SERVED) within the mailing street name (PWS-MAIL-STREET) in ascending order. In computer terms, the mailing street name would be regarded as the major sort with the population served as the minor sort.

The re-sorting described above is performed after the water supplies are selected based upon the selection criteria. For example, if the water supplies to be selected are located in the states of Alabama, Texas, and Wisconsin, the following steps would be performed: (1) select water supplies in the above named states; (2) sort the water supplies based upon the discussion in the above paragraph; and (3) randomly select water supplies based upon a random number generator algorithm.

If you need further information about these materials, please contact A.W. Marks of the Office of Drinking Water at 703-382-5513.

Sincerely,

David J. Severn, Chief
Exposure Assessment Branch
Hazard Evaluation Division

cc: Robert Taylor, Registration Division