



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

May 15, 1995

MEMORANDUM

SUBJECT: Action Items Regarding Metolachlor Field-Scale Ground-Water Monitoring Study

FROM: Kevin Costello *Kevin Costello*
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (7507C)

THROUGH: Elizabeth Behl, Section Head *EBehl*
Ground Water Technology Section
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (7507C)

AND: Hank Jacoby, Chief *Hank Jacoby*
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (7507C)

TO: Jane Mitchell
Special Review and Reregistration Division (7508W)

As we discussed over the phone, I am submitting responses to Ciba's April 25, 1995 and May 9, 1995 memoranda concerning "action items and agreements" that must be resolved in order for them to begin the metolachlor ground-water studies. For the sake of clarity, I will address each action item in the April 25 memorandum in order, and attach a copy of the same.

1) "Kevin Costello to review Dual label to determine if rate used in ground water studies should be maximum use rate for the particular soil texture." Ciba states in the May 9, 1995 memorandum that the current maximum label rate for corn on sandy soils is 4 lb ai/acre, and suggests that this rate would be appropriate for the Wisconsin study. Further, Ciba reports that they will submit an administrative amendment to the Agency requesting that the maximum application rate for peanuts be reduced to 4 lb ai/acre, and requests that this be the rate used for the Georgia site.



The protocol should be amended to include application rates for both sites of 4 lb ai/acre, as opposed to the current 6 lb ai/acre, contingent upon the submission of the above-mentioned administrative amendment.

2) "Will the Agency allow compositing of deep soil samples...?"

The draft revisions to the field-scale ground-water monitoring study guidelines call for a greatly reduced suite of soil samples, both in depth and the number of sampling dates. However, these guidelines also call for the analysis of individual soil samples, without compositing. Soil samples collected during the two metolachlor ground-water monitoring studies should not be composited.

3) "Soil samples will be analyzed for parent only."

This is acceptable, based on current information on the characteristics of metolachlor degradates, and should be incorporated in the protocol revisions.

4) "(U)se of collection pans rather than taking and analyzing soil cores to verify application rate on day 0...". EFGWB received information from Ciba on the proposed collection pans, and this method is acceptable.

The protocol should be amended to include the use of collection pans instead of soil sampling on Day 0 to verify application rate.

5) "Kevin Costello to... provide feedback on the acceptability of using the immunoassay method and presence of bromide tracer to determine which samples are further analyzed by another technique."

Ciba proposed in the April 20, 1995 meeting that full GC/MS analysis for metolachlor and degradates in soil water and ground water not begin until either bromide is detected, or metolachlor is detected through analysis using an immunoassay method. Once either bromide or metolachlor is detected in this way, all soil water and ground water samples will be analyzed by GC/MS method at all depths. This proposal is acceptable. The protocol should be revised to reflect this agreement.

As agreed in the April 20, 1995 meeting, these amendments to the protocol will be included in the first quarterly report for the metolachlor ground-water studies, as opposed to re-submitting a revised protocol in full before the start of the field phase of the studies. Ciba should initiate the field phase of these studies immediately.

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Ciba Plant Protection

By Facsimile



Ciba Geigy Corporation
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April 25, 1995

Ms. Jane Mitchell
Special Review and Reregistration Division (H7508W)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Dear Ms. Mitchell:

**Subject: ACTION ITEMS AND AGREEMENTS RESULTING FROM
APRIL 20, 1995 MEETING WITH EF&GWB AND SRRD
REGARDING METOLACHLOR SMALL-SCALE PROSPECTIVE
GROUND WATER MONITORING STUDIES IN WISCONSIN
AND GEORGIA**

Below is a brief summary of the actions and agreements reached at our meeting last week with you and Kevin Costello regarding the field study design and analytical work to be done in connection with the subject studies.

- Kevin Costello to review Dual label to determine if rate used in ground water studies should be maximum use rate for the particular soil texture, in this case, coarse, or the maximum labeled use rate for the crop (corn and peanuts), i.e. 6 lbs. The recommended use rate for coarse soils is 2 lbs. Two applications can be made.
- Soil samples will be taken through 14 days. Will the Agency allow compositing of deep soil samples or must individual cores be analyzed. Kevin Costello to provide feedback.
- Soil samples will be analyzed for parent only. Kevin Costello to check on the acceptability of this.
- It was agreed that at the Georgia site, soil sampling on 0-day, if required, will take place and then the product will be incorporated into the soil.
- It was noted that the protocols had been amended so that both require irrigation 2 days after application.

Ciba Plant Protection



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Hand Delivered

May 3, 1995

Dr. Kevin Costello
EF&GWB (H7507C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Dear Kevin:

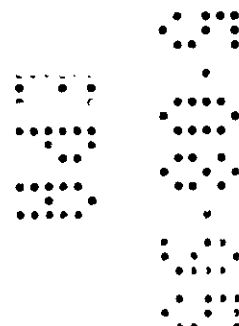
Enclosed is the collection pan device we proposed for use in the metolachlor gw studies to verify application rate on zero-day. Also provided is information on the procedures used to extract the spray material from the pan. Please contact Jerry Smith at 910 632-2928 if you have any further questions or want to discuss the proposal further. We shall look forward to your feedback on this and the other action items noted in my letter of April 25, 1995.

Sincerely,

Karen S. Stumpf
Karen S. Stumpf
Senior Regulatory Manager
Regulatory Affairs

Enclosure

✓ cc: Ms. Jane Mitchell
SRRD (H7508W)



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