

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

13 MAY 1981

SUBJECT: EEB review of the protocol for field monitoring studies of oxyfluorfen(Goal)
(Protocol received in EPA, 21 April 1981)

FROM: Fish and Wildlife Biologist, Ecological Effects Branch

TO: Richard Mountfort (P.M. 23) Registration Division

Thru: David Coppage, Head, Section #3, EEB *DaC*

Thru: Clayton Bushong, Chief, EEB *CB*

The Ecological Effects Branch has the following comments in regard to the 1981 field monitoring program for Goal in addition to those comments listed by the Environmental Fate Branch (Sami Malak's 11 May 1981 protocol review, attached):

1. The sites selected for runoff monitoring in soybeans should not be adjacent to endangered clam habitats but should be similar to sites so situated in regard to slope, soil type, rainfall, and other erosion-related factors.

Malacologists who might be willing to describe the erosion-related factors of fields adjacent to vulnerable endangered clams to Rohm and Haas personnel include, but are not limited to:

Ms. Marian E. Havlik
Malacological Consultants
1603 Mississippi Street
Lacrosse, Wisconsin
54601

Dr. Marc Imlay
Fish Pesticide Research Laboratory
U.S. Dept. of Interior
R.D. 1
Columbia, Mo.
65201

Dr. David H. Stansberry
Museum of Zoology
Ohio St. University
Columbus, Ohio
43210

2. If possible, the C. E. Quinn farm, in Duplin Co., should be among the corn farms monitored for Goal.

3. Aquatic plant field bioassays are still required. Dr. Kerry K. Steward's 31 May 77 letter appears to indicate that waterlettuce or cabomba might be good species to be used in the bioassay.
4. The details contained in Appendix D of the March, 1981 Position Document are to be included in the monitoring protocol. Inclusion of these details is a condition of the registrations.

Robert K. Hitch

Robert K. Hitch
Fish and Wildlife Biologist

cc: Joline Chinchelli, SPRD
Amy Rispin, HED
Willa Garner, EFB
Sami Malak, EFB
EEB Registration and
RPAR files