



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

02 MAR 1984

MEMORANDUM

SUBJECT: Leaching Potential of FMC 57020 - A New Herbicide

TO: William Burnam, Chief
Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Dr. David Severn, Chief *David Severn*
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

FROM: Samuel M. Creeger, Chief *SMC*
Section #1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

Our review of field dissipation data submitted by FMC in support of an EUP request for use of FMC 57020 on soybeans showed the chemical to have a potential to leach and contaminate ground water.

We have made clear to the Registration Division and to FMC that the leaching potential will have to be more clearly defined before we can conclude that the leaching data requirement has been satisfied. Therefore, we have requested FMC to conduct a field dissipation study at a site containing the highest percentage of sand and the lowest percentage of organic matter but which is still grown to soybeans. Enough irrigation/rainfall is to be applied to simulate a worst case situation and soil sampling is to be done to depths sufficient to define the extent of leaching. The soil cores are to be analyzed for parent compound and "Metabolite A" which was found to form under anaerobic soil conditions.

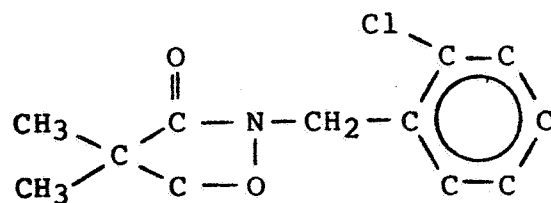
Review of this dissipation study will allow a more complete assessment of the ground water contamination potential. Based on the study, we may recommend restrictions against use in certain geographical areas and/or submission of actual ground water monitoring data.

In the interim, you might consider whether the toxicological data base is adequate to establish an ADI and thus, a health advisory level for both parent and the metabolite.

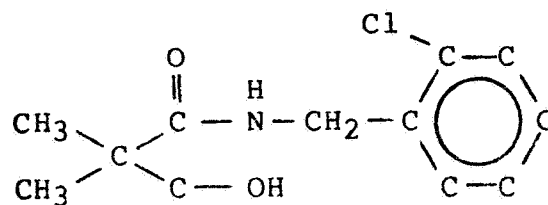
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FMC 57020



Metabolite A



CC: BOB TAYLOR
(PM 25)

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