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June 28, 1983

REPORT OF MEETING, JUNE 27, 1983.

SUBJECT: FMC 57020 4 EC Herbicide, EUP Permit No. 279-EUP-93

Participants:			
	C. Fletcher, EAB, HED	R. Cook,	FMC
	R. Moraski, "	R. Robinson,	"
	J. Remmers, HRB, RD	J. Lauber,	"

EAB met with FMC representatives to discuss EAB review of FMC 57020, dated 12/3/82.

FMC wanted further clarification of the following EAB comments:

1. EAB's recommendation that the FMC field dissipation study include monitoring for leaching and contamination of ground water. FMC acknowledged that FMC 57020 has the potential to leach in soil and, most likely, will contaminate ground water. The soil characteristics of FMC 57020 are very similar to atrazine (a compound known to leach). Will it be necessary to go below 12 inches of soil depth to show it will leach. Note: FMC said the field dissipation study is already underway.) Rather than deeper sampling, FMC offers to conduct modeling simulation studies to predict the extent of leaching.

   EAB response: No, it will not be necessary to show that it leaches since the company acknowledges that the compound most likely will leach below 12 inches. However, in the registration submission, FMC should explain why soil was not sampled below 12 inches when FMC 57020 is known to leach. EAB recommended to FMC they contact Bob Holst for information concerning the PESTANS model or other modeling for information in this area.

2. When is a tank mix soil dissipation study necessary? FMC 57020 will be tank mixed with other pesticides.

   EAB response: This data requirement has been deemphasized in the Guidelines. Given the list of chemicals to be tank mixed with FMC 57020, EAB is unable to predict circumstances that would trigger this data requirement. The registrant should be in a better postion to know how their chemical would affect the other chemicals.

3. Must a fish accumulation study be conducted.

   EAB response: Yes. Based on the facts that FMC 57020 is water soluble, is stable in water and will have the potential to reach water, a fish accumulation study will be necessary. However, EAB acknowledges that FMC 57020 has a low partition coefficient of 350.

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Note: In follow up comments after the meeting, EAB suggested that FMC become aware of the Agency's groundwater contamination policy (since FMC will have to conform to such policy). FMC should also become aware of the Toxicology Branch, HED, concerns for groundwater contamination.

FMC was told that the question may arise as to whether their chemical, FMC 57020 may in some way complex with chemicals with which it is tank mixed and leach/carry it also into groundwater. If a field monitoring study is required (based on model predictions), it may be necessary to monitor for the tank mixed chemical also. (This would be an example of when a tank mix soil dissipation study would be required.)

Clinton Fletcher
Review Section No. 1
Exposure Assessment Branch

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