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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

TO: Christine Rice/ Tom Meyers PM 52
Reregistration Division (H7509C)

FROM: Brinson Conerly-Perks, Chemist *BC-P* 9/30/92
Chemistry Review Section 3, Environmental Fate and Ground Water Branch

THROUGH: Akiva D. Abramovitch, Chief *Akiva Abramovitch*
Chemistry Review Section 3, Environmental Fate and Ground Water Branch,
and
Henry Jacoby, Chief *Henry Jacoby*
Environmental Fate and Ground Water Branch, EFED (H7507C)

SUBJECT: Benfluralin -- BARCODE D171535, EFGWB # 92-0279 -- Upgrading of
Hydrolysis Study by Submission of Additional Discussion

The original study together with the additional discussion is marginally acceptable, and no further data are required. The applicant should note that if significant hydrolysis had been observed, the study would not be acceptable for the following reasons:

- 1) The non-standard conditions and somewhat erratic recoveries would make interpretation of the data difficult.
- 2) A reliable half-life could not be established.
- 3) A comparison of the relative longevity of Benfluralin vs other compounds could not be made.

A copy of the original review is attached.

The information the applicant has provided includes the following:

- 1) buffers -- they were slightly less than 0.1M, which is higher than the Guidelines specify. However, the applicant points out that since there was little or no hydrolysis, there could not have been significant buffer catalysis. EFGWB agrees. This deficiency is resolved.
- 2) recovery data -- recovery was somewhat erratic, according to the table which had been included in the original

review. However, it is clear that little or no hydrolysis was observed. This deficiency is resolved.

- 3) correction for recovery -- reported values were corrected by using the mean value for two recovery samples at that sampling time and pH. This deficiency is resolved.
- 4) temperature -- the applicant reports the temperature readings in the incubation room at each sampling. The recorded temperature is slightly higher than the Guidelines specify, but is not likely to have significantly affected the results. This deficiency is resolved.