US EPA ARCHIVE DOCUMENT

8/10/94

METOLACHLOR RISK MITIGATION FOR EFED

EFGWB Recommendations

1. Prospective ground-water monitoring studies be conducted.

2. Registrant should establish a ground-water monitoring program in cooperation with states where metolachlor is used to determine appropriate label restrictions.

3. Registrant san EPA will agree, as a condition of reregistration eligibility to establish criteria for additional mitigation, suspension and voluntary cancellation as a consequence of monitoring study results.

4. Metolachlor should be considered a candidate for restricted use classification for ground-water concerns.

5. Metolachlor be considered for regulation under State Management Plans.

6. Metolachlor has been detected in ground water as a result o normal agricultural use that exceed the HAL. Registrant should determine areas that are vulnerable to ground water contamination and recommend label restrictions.

Ciba-Geigy's response to EFGWB's Recommendations

Ciba-Geigy met with SRRD on June 2, 1994 to discuss risk mitigation recommendations. On June 14, they submitted their response along with statistical summaries of metolachlor detections in ground water and surface water.

1. Ciba-Geigy believes that when the restricted use for ground water is in place, metolachlor will likely be classified as restricted use and propose it for State Management Plans. Ciba believes these programs should run their course and should take place outside of the RED process.

2. Ciba-Geigy is in the process of initiating two small-scale prospective ground water studies. Final protocol was submitted August 3, 1994. Studies are planned to be initiated in Spring 1995.

3. Ground water monitoring which has been done over the years shows that more than 98% of the wells sampled were below detection limit of 0.1 ppb. Where the HAL was exceeded and investigation done, point source contamination resulted in the contamination. All the data that contamination above HAL from normal agricultural use is highly unlikely. Some clarification is needed on the Agency definition of "normal agricultural use.

4. If and when metolachlor is identified as a **candidate for**

SMP's, Ciba-Geigy will work with the states as in the past.

5. Ciba Geigy is concerned about making suspension or voluntary cancellation a condition of reregistration. (They feel they are being lumped together with acetachlor decision.) On July 27, metolachlor was changed from a CQ to a C. Acetachlor is a B_2.

EEB Recommendations

1. In the small mammals portion of the EEB RED chapter the endangered species LOC was exceeded for the meadow vole at rated of 2 and 6 lbs ai and for the least shrew at a rate of 6 lbs ai. The restricted use LOC was exceeded for the meadow vole at 6 lbs ai. EEB has now recalculated the risk quotients using the typical EEC instead of the maximum EEC. The LOC for endangered species is triggered at 4 lbs or greater ai. Risk mitigation measures for small grass eating mammals are necessary.

2. LOC's were also triggered for aquatic organisms because of the rights-of-way use pattern.

3. EEB has agreed to wait for results of phytotoxicity studies before imposing any mitigation measures. EEB believes that there will be a risk to non-target aquatic and terrestrial plants. So no risk assessment has been done for non-target plants.

4. LOC was triggered for endangered birds because of eggshell thickness.

EEB recommended four measures which would mitigate this risks. Reduction in the rate of application, reduction of number of applications, limiting application to incorporated methods only, and elimination of aerial application.

Ciba-Geigy's Response

1. Ciba-Geigy has agreed to conduct phytotoxicity studies.

2. Ciba-Geigy has agreed to remove rights-of-way use. This will eliminate acute or chronic risk to aquatic organisms.

3. Ciba-Geigy is conducting new avian reproduction studies. Ciba-Geigy has also submitted supplementary data for the mallard reproduction study which corrects the raw data and presents a new statistical evaluation which eliminates ny statistical difference between the control and treated groups for the eggshell thinning effect. EEB has accepted this information and agrees with the results but will not change risk assessment until original raw data pages are submitted. When these are submitted the risk quotient will change for endangered birds and LOC will not be exceeded.