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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 15 1994

NOTE

TO: Walter Waldrop
Product Manager 71
Special Review and Reregistration Division

FROM: Henry Jacoby
Chief, Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division

Henry Jacoby 8/15/94

RE: Recommendations for Metolachlor

This note is being written to explain the position of EFGWB regarding metolachlor and ground water. Using the information we have in house, metolachlor has proven to be a ground-water contaminant throughout its use area. As with most pesticides, the levels found in ground water in all of these areas are generally low compared to its Health Advisory or MCL. However, in the case of metolachlor, concentrations in ground water also have been found to exceed the MCL, a number upon which all regulatory actions are based. As you know, contamination of ground water is difficult to impossible to clean up - and the problem lasts a long time.

The Branch believes that the mitigation measures recommended in our metolachlor RED chapter are important for adequate protection of ground water. As we mentioned to you in the meeting on August 10th, the recommendations were also meant to be consistent with the current policy as established by Lynn Goldman. As we understand it, we need to make recommendations to protect ground-water resources from contamination from pesticides - especially when some problem to human health or the environment may result. Metolachlor has been found in ground water from nonpoint <u>and</u> point sources at levels higher than those set for health standards which gives us cause for concern, albeit not as frequently as some other pesticides.

Thank you for clarifying the position of SRRD and upper management on the status of Restricted Use classification and State Management Plans. It is understandable that these particular regulatory options may not apply until the rules are finalized. In the case of metolachlor, the Branch believes that in order to minimize the contamination of our ground-water resources, restricted use and SMPs seem appropriate pollution prevention mitigation actions and metolachlor is a good candidate for both. Considering that widespread contamination of ground water by

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metolachlor has occurred, it is important to find some protective measures as soon as possible. In accordance with the new paradigm, we are requesting that you consider taking measures to mitigate ground-water contamination by metolachlor.

If SRRD is not sure that these mitigation measures are applicable to the reregistration of metolachlor, we would request that you confer with your management to clarify the options available in this case.