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SUBMISSION PURPOSE Review monitoring protocol for rice use

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

JAN 30 1990

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Review of Iprodione Residue Monitoring Protocol

FROM: James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H-7507-C)

TO: Susan Lewis, Product Manager 21
Fungicide and Herbicide Branch
Registration Division (H-7505-C)

The Ecological Effects Branch(EEB) received the "Iprodione Aquatic Residue Monitoring Study on Rice" on January 8, 1990 from Rhone- Poulenc. Since then, EEB has reviewed the document and has had two telephone conversations, January 17, 1990 and January 18, 1990, with Dr. James Hobson (Rhone- Poulenc) and Ron Beavers (Springborn Bionomics). EEB recommends the following changes be incorporated into the protocol, in order to ensure that the study will provide us with results that will be adequate for a risk assessment:

1. The company has proposed two sites. EEB recommends that five sites be used in the residue monitoring study since we have determined that less than five sites is not considered to be statistically sound. EEB has received data in the past that has shown so much variability, that the data are not useful for risk assessment purposes. Based on our conversations with the company, five sites will be chosen, with two sites in Texas, two sites in Louisiana, and one site in Arkansas. Of those five sites, two will be in estuarine environments, and three will be in freshwater environments. After a discussion with Miachel Rexrode, a member of EEB staff, we believe an average ranging from 5 ppt to 25 ppt salinity over the duration of the study period would represent an estuarine environment.

2. EEB recommends that rainfall and wind be measured at the sites, especially at the time of treatment.

3. EEB does not feel a reference site is necessary for this study. Reference sampling at the same site prior to treatment is adequate.

4. EEB recommends that the spray drift be measured in all directions from the treated area as well as in the receiving water, as described in the protocol. Eight drift card zones, 100 ft from treated site, surrounding the treated area should be adequate.

5. The sample schedule should include sampling 96 hours post-application, in order to provide results that may be used in a risk assessment, since many of the acute aquatic testing are conducted for 96 hours. The 72 hour sampling may be deleted from the protocol.

6. The study authors were initially measuring the residues in the water to levels below toxicologically significant residues in water. EEB recommends that the residue analysis, for both freshwater and estuarine samples, be conducted to the lowest level of detection, and should be well below 7 ppb (the lowest NOEL).

7. EEB recommends that the sediment sampling should include a core sample from 0 to 10 cm. However, the residue analysis should only be conducted to the level where the chemical can no longer be detected, in 2.5 cm increments. For example, the study authors should analyze the sediment 2.5 -5.0 cm at one site nearest the outflow. If no residues are detected, then no analysis are needed at other sample sites below 2.5 cm. All the samples should be archived until the residue analysis is completed and the data submitted and reviewed by us.

Dr. Hobson indicated in this morning's telephone conversation that the recommended changes will be incorporated in the final site specific protocol. The study will be conducted this summer in case the weather conditions are not favorable and the study may need to be repeated.

EEB is looking forward to reviewing the final protocol this spring. If you have any further questions, please feel free to contact Candy Brassard at 557-0019 or Dan Reider at 557- 1451.