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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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Case 046754; Chemical 123000

MEMORANDUM

Subject: Isoxaflutole PGW protocol followup

To: Dan Kenny, PM Team Reviewer
Registration Division (7505C)

From: Ian Kennedy, Hydrologist
Environmental Risk Branch II
EFED (7507C)

Through: Tom Bailey, Branch Chief,
ERB II, EFED (7507C)

Summary. Aventis agreed with many of EFED's comments on the Indiana PGW protocol. Some differences remain, but any problems will have to be deferred to the evaluation of the study. Below are some specific comments on things that should be altered for the remainder of the study.

Field spikes make it possible to account for any concentration changes during sample shipment. EFED is concerned about recovery measured from the time of sampling, as well as recovery due to the analytical method. EFED would still like to see field spikes included with sample shipments because shipping conditions are variable and because more QA samples will increase confidence in the results. Spikes should also be kept with stored samples as a supplement to the storage stability study and to allow determination of any changes during storage.

Irrigation is desired because climate is variable. In a dry year an irrigation system will allow the study to proceed and produce valid results. Using an unirrigated site risks having a study in which insufficient movement occurs and may also postpone the termination of the study. We do, however, understand the difficulty in finding a field wet enough to require drainage yet dry enough to have an irrigation system.

Sampling below tile lines. Although there is some risk in damaging the tile lines when sampling below the tile level, taking such samples will allow a much better calculation of mass balance in the study. Without such samples it is impossible to determine how much chemical leached below the tile lines and because these fields have only seasonally high water tables, some leaching is likely to occur. It should be possible to use a hand driven soil sampler carefully enough to avoid damage to the tile lines in the unlikely event the sampler should encounter one. Also, samples taken later in the season should not significantly change chemical movement in the profile. Because of the tile sampling, EFED agrees that lysimeters are not needed for this study.

Aventis' clarification on the sampling schedule, and the inclusion of flow measurements are acceptable and should be incorporated into the protocol.