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

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

March 13, 1996

MEMORANDUM

SUBJECT: Action Items Regarding Metolachlor Field-Scale Ground-Water Monitoring Studies

FROM: Kevin Costello Kevin Costello 3/14/96
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (7507C)

THROUGH: Elizabeth Behl, Section Head
Ground Water Technology Section
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AND: Hank Jacoby, Chief Henry Jacoby 3/13/96
Environmental Fate and Ground Water Branch
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TO: Jane Mitchell
Special Review and Reregistration Division (7508W)

As we discussed over the phone, I am submitting responses to Ciba's questions that must be resolved in order for them to begin their Minnesota metolachlor ground-water study. CIBA has requested EFGWB's consent to apply a new formulation of metolachlor for this second prospective ground-water monitoring study for this chemical. CIBA described this new formulation as being a different isomer of metolachlor, one that could cut application rates by half while not sacrificing efficacy. CIBA predicted that this formulation will replace current formulations of metolachlor within several years. EFGWB believes it is appropriate to use the new formulation of metolachlor for the second prospective study, and requests that CIBA periodically update the Branch on the progress in phasing out current metolachlor formulations.

In addition, CIBA recently informed EFGWB that it had confirmed the existence of an ESA degradate of metolachlor, which may account for the fate of as much as 12% of applied metolachlor. CIBA asked EFGWB

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whether it should add metolachlor ESA to the suite of analytes in the two prospective metolachlor ground-water studies. CIBA should analyze for metolachlor ESA in both prospective ground-water studies. Until such time that CIBA determines whether the ESA metabolite can be detected with the current ELISA method for metolachlor, CIBA should use the "mild-extraction" LC/MS method they used to identify the degradate. It is unclear whether the ELISA method will detect metolachlor ESA; results from the second quarterly report for the Wisconsin study indicated that the ELISA method was unable to detect degradate CGA-51202.