From: Faruque Khan
To: Alexandra LaMay
Cc: Charles Peck
Subject: Re: PERFUM files
Date: 02/13/2013 01:46 PM
Attachments: PERFUM output 24d.xlsx
PERFUM2_24d80acre4corn.per.out
PERFUM2_24d80acre4soybean.per.out
PERFUM2_24d80acrecorn.per.out
PERFUM2_24d80acresoybean.per.out
PERFUM output 24d.xls

Her are the PERFUM files for corn soybean. Thanks. FK

▼ Alexandra LaMay---02/13/2013 01:24:17 PM---Thanks Faruque, Yes, if you could send me your PERFUM files I would appreciate it. Thanks,

From: Alexandra LaMay/DC/USEPA/US
To: Faruque Khan/DC/USEPA/US@EPA
Cc: Charles Peck/DC/USEPA/US@EPA
Date: 02/13/2013 01:24 PM
Subject: Re: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Thanks Faruque,

Yes, if you could send me your PERFUM files I would appreciate it. Thanks,

-Allie

▼ Faruque Khan---02/13/2013 01:19:22 PM---Hi Allie, EFED used the highest volatility flux of 1.88 x 10-8 g/m2-s from Little Rock, AR in the PE

From: Faruque Khan/DC/USEPA/US
To: Alexandra LaMay/DC/USEPA/US@EPA
Cc: Charles Peck/DC/USEPA/US@EPA
Date: 02/13/2013 01:19 PM
Subject: Re: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Hi Allie,
EFED used the highest volatility flux of 1.88 x 10^{-8} g/m^{2-}s from Little Rock, AR in the PERFUM modeling. We also scaled-up to 1000 lbs application rate to generate exposure. PERFUM produces concentration of 0 ug/$m^3$with label application rate. Once exposure were generated, values linearized with label application rate. As mentioned earlier, we used met data from met data from Illinois. I do not access of met data. Chuck is out of town for training but he checks his email. Hope he will be able to send you met file if you guys are interested.
Thanks

Faruque

▼ Alexandra LaMay---02/13/2013 09:53:19 AM---Faruque and Chuck, We had sent our contractor the flux profile I attached previously, which was base

From: Alexandra LaMay/DC/USEPA/US
To: Faruque Khan/DC/USEPA/US@EPA
Cc: Charles Peck/DC/USEPA/US@EPA
Date: 02/13/2013 09:53 AM
Subject: Re: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Faruque and Chuck,

We had sent our contractor the flux profile I attached previously, which was based on the flux summary you provided. Please let me know what you used for PERFUM modeling. I expect to have our PERFUM results on Friday this week. Thanks,

-Allie
▼ Faruque Khan---02/05/2013 01:25:52 PM---Hi Allie, To be consistent with PEFPUM runs from HED and EFED, we need to be consistent with inputs

From: Faruque Khan/DC/USEPA/US
To: Alexandra LaMay/DC/USEPA/US@EPA
Cc: Charles Peck/DC/USEPA/US@EPA
Date: 02/05/2013 01:25 PM
Subject: Re: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Hi Allie,
To be consistent with PEFPUM runs from HED and EFED, we need to be consistent with inputs for modeling. Chuck can provide your contractor the input file EFED used in PERFUM modeling. We also used weather data from Illinois to generate exposure. Let me and Chuck know your plan with PERFUM modeling.
Thanks
Faruque

▼ Alexandra LaMay---02/05/2013 09:54:54 AM---Good morning Faruque, I wanted to let you know that our contractor is performing PERFUM runs for 2,4

From: Alexandra LaMay/DC/USEPA/US
To: Faruque Khan/DC/USEPA/US@EPA
Date: 02/05/2013 09:54 AM
Subject: Re: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Good morning Faruque,

I wanted to let you know that our contractor is performing PERFUM runs for 2,4-D choline based on the flux data provided, now that we have final word on the inhalation tox POD. I have attached the spreadsheet below for the flux profile we have sent to the contractor as directions for the PERFUM runs. Thank you for providing the 2,4-D flux data. Please let me know if you have any questions or comments on this. I will let you know right away when I hear back from the contractor.
[attachment "24-D_flux_profile_020113.xlsx" deleted by Alexandra LaMay/DC/USEPA/US]
Is EFED planning to produce a DER for the study? It is my understanding that only a summary of the study would be required for our purposes, but please let me know your plans or if EFED has other needs regarding DER production. Thanks,

-Allie

▼ Faruque Khan---11/07/2012 09:05:34 AM---Hi Allie, FYI, we found a discrepancy related to the formulations identified on the treated fields i

From: Faruque Khan/DC/USEPA/US
To: Alexandra LaMay/DC/USEPA/US@EPA
Date: 11/07/2012 09:05 AM
Subject: Fw: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Hi Allie,

FYI, we found a discrepancy related to the formulations identified on the treated fields in Ty Ty, GA. It appears that Field 1 was treated with the choline formulation + additives and Field 2 was treated with the choline formulation. This only impacts the interpretation of flux, not the flux values. See the clarification below from the registrant..... Here is the revised flux info with corrected field identification and values.
Thanks
Faruque

[attachment "2,4-D FLUX DATA.xlsx" deleted by Alexandra LaMay/DC/USEPA/US]

----- Forwarded by Gabe Rothman/DC/USEPA/US on 11/05/2012 05:30 PM -----

From: "Havens, Patrick (PL)" <phavens@dow.com>
To: Gabe Rothman/DC/USEPA/US@EPA
Cc: "Fonseca, Diego (D)" <dfonseca@dow.com>, "Blewett, Craig (TC)" <tcblewett@dow.com>
Date: 11/05/2012 04:01 PM
Subject: 2,4-D field flux study (DAS study ID 120931) - table labeling errors

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Gabe – I was glad to hear that the review of this study has begun. Thanks for the heads-up on the problem with table heading labels for the Ty Ty, Georgia site. I've tracked things down as follows:

Page 14 - Table 2 - the heading are correct; treatment 1 is GF-2726 (mix of 2,4-D choline and glyphosate); treatment 1 is GF-2654 (2,4-D choline alone).

Page 29 – Table 14 – treatments 1 & 2 descriptions are reversed (Treatment 1 = 2,4-D choline + glyphosate DMA; Treatment 2 – 2,4-D choline)

Found two other tables with the same problem; 1) table 17 (bottom half) and 2) page 195 – again the treatment 1 & 2 descriptions are reversed, just like Table 14

Fortunately, none of these mis-labelings affect the reported results for fluxes & flux extrapolations. All the of reported final optimized fluxes and the plots of estimated mass losses are labeled correctly (i.e., they don't refer to treatment number but the actual (correct) tank contents). Extrapolations to the larger field sizes are also correct.

Hopefully, this will allow you to note the corrections on your copy right away so you don't have to stop your review.

We will make the changes and submit the corrected report through the usual front-end screen process. However, if you'd like a complete corrected copy, I'll be glad to send it to you directly when it's ready in a day or two. Just let me know what you need.

As you progress on your review, don't hesitate to contact me with any further questions.

Thanks again and best regards,

Patrick L Havens, PhD
Principal Research Scientist
Regulatory Sciences and Government Affairs
Office: 317.337.3465 phavens@dow.com
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