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

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Dr. Robert B. Fugitt  
Governmental Affairs  
E. I. du Pont de Nemours & Company, Inc.  
Wilmington, DE 19898

Dear Dr. Fugitt:

The Agency has reviewed the environmental fate data submitted in response to the Oxamyl Groundwater Data Call In Notice. The Agency concludes that oxamyl has the potential to reach ground water when used agriculturally. The Agency has identified the following deficiencies with the submitted studies:

- 1) Aged Leaching - Oxamyl-treated soil was aerobically aged for 30 days, then added to soil columns and leached. The amount of water used was not specified. The leachate was not analyzed specifically for oxamyl and oximino compounds, but was instead analyzed for  $^{14}\text{C}$  residues. It is not known how much of the  $^{14}\text{C}$  activity found in the leachate was due to oxamyl or the oximino compound. Because neither oxamyl nor the oximino were analyzed for in the leachate, this study is inadequate. A new study is recommended.
- 2) Field Dissipation Study - Oxamyl and the oximino degrade are moving to the three feet depth at least, in concentrations of  $\geq 10$  ppb. A soil pH is needed. The soil is expected to be alkaline because it is located in a lemon-growth area in Southern California. Soils of the San Joaquin Valley associated with citrus agriculture typically have a pH of 8.0.

These soils were irrigated with furrow irrigation. Oxamyl has been shown to degrade more rapidly in wet soils than in dry soils. This and the alkaline conditions may account for lower concentrations of oxamyl than expected in the soil.

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