

US EPA ARCHIVE DOCUMENT

File

106701

Date Out EFB:

NOV 04 1985

To: G. Werdig  
Product Manager 50  
Registration Division (TS-767)

From: Samuel M. Creeger, Chief *JM*  
Review Section No. 1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769)

Attached please find the environmental fate review of:

Reg./File No.: \_\_\_\_\_

Chemical: Fosamine ammonium

Type Product: Herbicide

Product Name: \_\_\_\_\_

Company Name: Dupont

Submission Purpose: Request waivers under the GWDCI

Date In: 9/25/85

Action Code: 495

Date Completed: NOV 04 1985

EAB # 5954

TAIS (level II)                      Days

0.2

Deferrals To:

\_\_\_\_\_ Ecological Effects Branch

\_\_\_\_\_ Residue Chemistry Branch

\_\_\_\_\_ Toxicology Branch

Monitoring study requested by EAB:

Monitoring study voluntarily conducted by registrant:

## 1. INTRODUCTION

The registrant, Dupont, is requesting waivers from soil photolysis (161-3), anaerobic soil metabolism (162-2), anaerobic aquatic metabolism (162-3) and forestry dissipation (164-3) for fosamine ammonium under the GWDCI.

Dupont feels the requirement for these studies can be waived because fosamine ammonium products are registered "for non-food terrestrial uses only".

## 2. DISCUSSION

Although 161-3 is not normally required to support registration of terrestrial non-food uses, it is appropriate to request this data since the active ingredient is foliar applied and, therefore, will reach the soil where it will be subjected to sunlight.

Since there are forestry uses of fosamine ammonium, requirements 162-2, 162-3 and 164-3 are applicable.

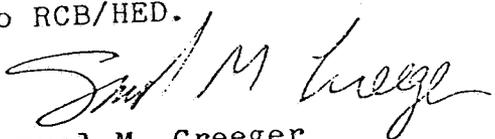
EAB cannot rule on the applicability of the octanol/water partition coefficient because it is a data requirement under the responsibility of the Residue Chemistry Branch/HED.

EAB does not have information to allow a determination of the accuracy of Dupont's statement re: fosamine ammonium products are registered "for non-food terrestrial uses only".

## 3. RECOMMEDATIONS

I recommend denying Dupont's request for waivers from the requirements of 161-3, 162-2 and 164-3. Requirement 162-2 can be filled by satisfying requirement 162-3. *SAE dk*

I also recommend that the question applicability of the octanol/water partition coefficient requirement be addressed to RCB/HED.

  
Samuel M. Creeger  
November 4, 1985  
EAB/HED