



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

12-21-86

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21 DEC 1986

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

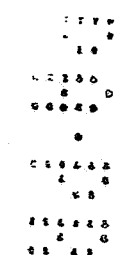
Dr. Robert B. Fugitt  
Governmental Affairs  
E. I. du Pont de Nemours & Company, Inc.  
Wilmington, DE 19898

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.



1-2  
1/2

More soil information and more accurate irrigation information is needed. If available, data on the soil types used in this field dissipation study should be sent to the Agency: soil type, percentage sand, silt, and clay, percentage organic matter, pH, percentage field capacity, water holding and wilting point. If available, data on the amount of water added as irrigation water versus rainfall, the timing of irrigation (frequency of application) and in what increments, i.e., 2 inches/week.

Response to the deficiencies

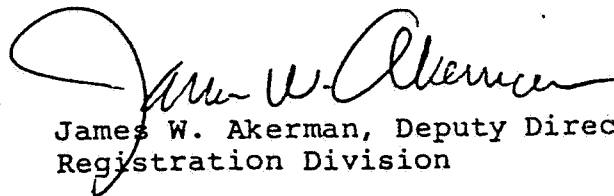
Within 30 days from receipt of this letter, you must notify the Agency how you plan to comply with the above deficiencies. You may select from among options 2 - 6 on the attached Data Call In Summary Sheet. The Agency will allow you 60 days to submit the pH. and irrigation information to the Agency. If the Agency does not receive an adequate response within 30 and 60 days, you may be subject to receipt of a Notice of Intent to Suspend.

If you have any questions regarding this letter, please contact Susan Lewis (703) 557-2639 or Geraldine Werdig (703) 557-7460.

Any responses to this letter should be sent to:

Geraldine Werdig, Chief  
Data Call-In Program  
Registration Division (TS-767)  
U.S. Environmental Protection Agency  
401 M Street SW.  
Washington, DC 20420

Sincerely yours,



James W. Akerman, Deputy Director  
Registration Division

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