

1/16/74

Environmental Chemistry evaluation No. 2 for Guthrie

Reg. No. 3125-123, 2F1292

Chemagro Corp.

I. Introduction

1. See evaluation dated 1/21/72
which was incorrectly dated 2/21/71.
2. See PR letter ^{in Folder 2 of 2 dated} March 27, 1972
requesting Chemagro to submit
data within one year.
Data has not be submitted
as of today.

II. Recommendation

A ~~We have~~ Object to registration (Corn use)

B We have had no response
to data requested in PRD
letter dated ~~of~~ March 27, 1972.
Chemagro has had almost 2 years
to obtain data. These data
are needed to support this
registration and any future
registrations.

C. The following is a list of data requested and as in PRD letter

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C. RL for environmental data submitted in support of PR Notice 70-15 are inadequate.

Data to supplement PR Notice 70-15 are as follows and should be submitted within one year.

1. Soil leaching study using labeled material. Soil should be Lakeland fine sand, sandy loam and silty clay loam. Breakthrough point should be determined. Soil should be fortified and left undisturbed for one week and 1 month before eluting starts.
2. A soil degradation study is needed. Labeled material should be used to determine material balance. Samples should be collected at PHI's of 0 day, 1 week, 3, 6, 12, and 20 weeks.
3. Answers to 2(a), (b), (c), (d), and 5. (a), and (b), and (c) in PR Notice 70-15.
4. Runoff studies should have included separate analysis silt, soil particles from runoff water.
5. A fish residue study is needed. "

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Environmental Chemistry Section
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