Evaluation of data for Guthion in response to PR Notice 70-15 Submitted by Chemagro Corporation Letter of February 25, 1971

# I. Introduction

1. This is the first response for 70-15 for Guthion.

# II. Discussion of Data

1. Analytical Method is modified residue method. Instrument used in Beckman GC-4, with metal thermionic detector.

#### 2. Runoff.

- (a) 3 lanes 15, 20 and 30 feet long slaped at about 1 inch 1 foot water was collected at end of lanes.
- (b) Guthion SC was applied at a rate of 20 lbs. A/A(0.5 lbs. A/qall.
- (c) Plots were protected from natural rainfall.
- (d) Highest runoff was on sandy loam, and lowest was on high organic silt loam. Intermediate on silt loam. At the end of 37 days the following data are listed:

	Movement 5 ft.		10 ft.		20 ft.	
Soil T <u>y</u> pe	gal. H <sub>2</sub> 0	% moved	gal.	%	gal.	<del></del> %
Sandy Loam	4.5	ND	6.5	ND	5	ND
Silt Loam	6	0.05	7	0.04	5	0.04
High Organic						
Silt Loam	4	0.01	7	0.03	4.5	ND

It should be noted that at 2, 7, 16 and 23 day movement may be noticed especially in sandy loam. It is possible that at the end of the 37 days testing Guthion degraded to products that could not be determined water analysis was not submitted from run-off at end of lanes. We must have.

# 3. Leaching.

- (a) Soil colmuns 45 cm long, 1.6 cm diameter, 15 gms of soil were mixed with celite filter aid and placed in colums. Colums were weighed dry and wet.
- (b) 10 ppm of technical Guthions was applied to top of soil and topped with sand.

- (c) Data was not submitted on soil or on watered eluted through column.
- (d) Chemagro states the following:

Soil	Inches of rainfall required to leach Guthion l foot		
Sandy Loam	62		
Silt Loam High Organic	195		
Silt Loam	186		

# 4. Adsorption

(a) Technical Guthion was made up as 2.67, 3.55 and 4.44 49/ml. 5 ml of each were equilibrated with 1 gm of soil for 2 hours by shaking. The water was drawn off and analyzed. What was left on the soil was calculated. The adsorption coefficient (kd) is given as follows:

Soil	Kd (m1/gm)
Sandy Loam	3.33
Silt Loam High Organic	11.04
Silt Loam	28.50

(b) Data on how much stayed in water phase or could be extracted was not submitted. We must have data.

### Water stability

(a) The following was submitted:

(α)	The forfowing was	Jubili Coca.	1/2 life	in days
	System	PH	30°C	50°C
Phosphate buffers in capped amber bottles held indoors in const.		. 5	17.3	1.8
		7	10.0	1.3
temp. water baths. Technical Guthion was used.	9	0.5	0.08	
	•	PH	29°0	
with and	ing pool, filled 2 inches silt 10 inches of r. Held outside	7	1.2	

- 6. Soil Persistence
- (a) Data previously submitted indicated the following:

	Soil Type	1/2	Life
Muck	Sand	32	days
Clay		100	days
	Loam	84	days

# III. Conclusion

- 1. Runoff Data We need to know the ppm added and the ppm found in soil at times stated. We need analysis of the runoff water.
- 2. <u>Leaching Data</u>
  We need to know the ppm added and the ppm at different levels.
  We need analysis of water eluted through the columns and how
  much water was used.
- 3. On 70-15 we need good reliable data on all points, not the good data submitted. We need recovery data indicating that the analytical method determines parent compound and degradation products.
- 4. Adsorption Study We need to know the ppm added, found in water, through the amount that could be extracted from the soil and the amount remaining on the soil.