



STATE OF WASHINGTON  
DEPARTMENT OF AGRICULTURE

PO Box 42560 • Olympia, Washington 98504-2560 • <http://agr.wa.gov> • (360) 902-1800

MEMORANDUM

**Date:** November 18, 2011

**To:** Kathy Hamel, Aquatic Plant Specialist  
Department of Ecology, Water Quality Program

**From:** Erik W. Johansen, Special Pesticide Registration Program Coordinator  
WSDA, Registration Services Program

**RE:** AquaSurf

I recommend that you add AquaSurf (WA Reg. No. 17545-11001) to the list of spray adjuvants that are allowed for use on aquatic sites in Washington under the applicable Aquatic Pesticide Permits issued by Ecology. Here is a summary of the aquatic acute toxicity information for AquaSurf:

Product name	Registrant	Principal Functioning Agents	Acute toxicity to Rainbow trout	Acute toxicity to Daphnia magna
AquaSurf	Monterey AgResources	Petroleum oil, saccharides, polyoxyethylene sorbitan fatty acid ester	LC50 (96 hour) >100 mg/L, Practically non-toxic	LC50 (48 hour) >100 mg/L, Practically non-toxic

AquaSurf is currently registered for distribution in Washington, and is labeled for use on aquatic sites. Aquatic acute toxicity studies for AquaSurf have been reviewed by Kelly McLain, M.S. (WSDA Pesticide and Water Quality Specialist), and the studies are acceptable. AquaSurf meets all WSDA criteria for registration of spray adjuvants for aquatic use (attached). Addition of AquaSurf to the Aquatic Pesticide Permits will provide an additional option for aquatic pesticide applicators.

Aquatic acute toxicity studies are on file at WSDA Registration Services Program, and are available for review by Ecology. Feel free to contact me if there are any questions regarding this proposal.

attachment

cc: Mike Norman, WSDA  
Kelly McLain, WSDA

Ted Maxwell, WSDA  
Lynn Georges, Monterey AgResources



## Definition

### WSDA Criteria for Registration of Spray Adjuvants for Aquatic Use:

The following criteria must be met to register a spray adjuvant for aquatic use in Washington:

- The adjuvant must fulfill all requirements for registration of a food / feed use spray adjuvant in Washington.
- The adjuvant must be either slightly toxic or practically non-toxic to freshwater fish. Rainbow trout (*Oncorhynchus mykiss*) is the preferred test species.
- The adjuvant must be moderately toxic, slightly toxic or practically non-toxic to aquatic invertebrates. Either *Daphnia magna* or *Daphnia pulex* are acceptable test species.
- The adjuvant formulation must contain less than 10% alkyl phenol ethoxylates (including alkyl phenol ethoxylate phosphate esters).
- The adjuvant formulation must not contain any alkyl amine ethoxylates (including tallow amine ethoxylates).

### Exceptions:

(1) These criteria do not apply to adjuvants that are permitted for use under an aquatic experimental use permit issued by WSDA (WAC 16-228-1460).

(2) These criteria do not apply to adjuvants that are labeled and intended only for the aquatic uses listed in WAC 16-228-1231(2).

(3) On a case-by case basis, WSDA may register spray adjuvants for aquatic use that do not meet one or more of the above criteria if the registrant provides additional data (such as chronic aquatic toxicity studies, product physical characteristics and/or use site characteristics) which demonstrate that the proposed use will not cause unreasonable adverse effects to desirable aquatic species (including fish, aquatic invertebrates, shellfish and amphibians).