



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

OPP OFFICIAL RECORD  
HEALTH EFFECTS DIVISION  
SCIENTIFIC DATA REVIEWS  
EPA SERIES 361

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

21-JUN-2002

RE: D283478

Mark Wirtz, Chemist  
Food and Drug Administration  
Division of Pesticides and Industrial Chemicals  
200 C Street, S.W. (HFS-335)  
Washington, D.C. 20204

Dear Mr. Wirtz:

Enclosed you will find analytical methodology and petition method validation for the quantitation of residues of imazapic in/on grass forage and hay; and livestock commodities. Provided the EPA addendum is included (page 8 of attachment #2), the methods submitted by the petitioner have been determined to meet the Health Effects Division (HED) guidelines for enforcement of the proposed tolerances for the residues of imazapic in/on grass forage and hay; and livestock commodities.

This method should be published in PAM II as Roman Numeral method. If there are any questions about this material please call me at (703) 305-7330.

Sincerely,

*William H. Donovan*

William H. Donovan, Ph.D., Chemist  
Registration Action Branch 1/HED (7509C)

Attachments:

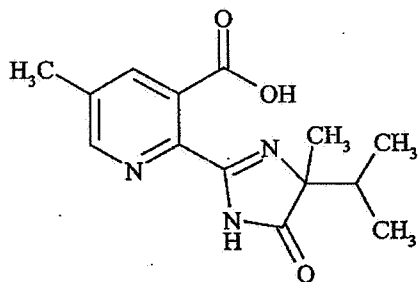
1. PAM-II Cover Sheet.
2. Petition Method Validation Report; D271928, A.J. Krynitsky, 13-MAY-2002.
3. Residue Methodology: "Independent Laboratory Validation of Capillary Electrophoresis (CE) Determinative Method for CL 263222, CL 263284, and CL 189215 Residues in Grass, Radiovalidation, and Multiresidue Method". (MRID 448177-09, not available electronically).
4. Residue Methodology: "Independent Laboratory Validation of Methods to Measure CL 263222 and CL 263284 Residues in Cattle Muscle, Kidney, Liver Tissue, Milk, Bovine Milk Fat, and Tissue Fat and Multiresidue Method". (MRID 448177-10, not available electronically).

cc (with attachment 1 only): W. Donovan, F.D. Griffith (ACB/BEAD, 7503C)  
RDI: J. Herndon (21-JUN-2002), RAB1 Chemists (13-JUN-2002)  
W. Donovan:806R:CM#2:(703)305-7330:7509C

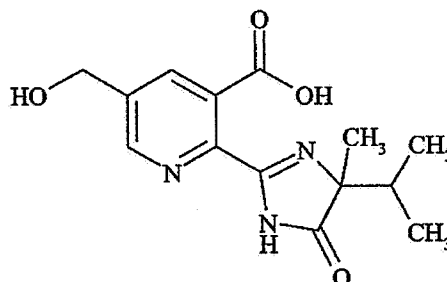
## Attachment 1

Acceptable Name: Imazapic  
Pesticide Reg. Section: 40 CFR §180.490

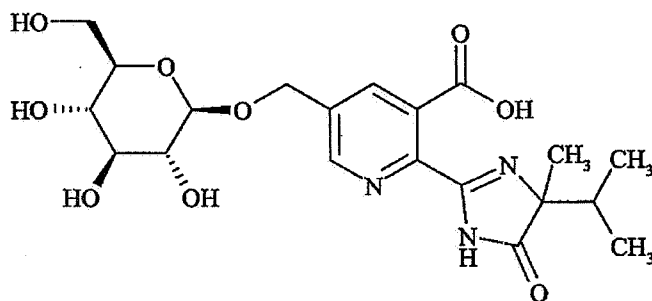
Structures:



IMAZAPIC



CL 263284



CL 189215

PC Codes: 128943 & 129041

Other Names: Plateau™ Herbicide

Petitioner: BASF Corporation

Methods: "Independent Laboratory Validation of Capillary Electrophoresis (CE) Determinative Method for CL 263222, CL 263284, and CL 189215 Residues in Grass, Radiovalidation, and Multiresidue Method". (MRID 448177-09, not available electronically).

"Independent Laboratory Validation of Methods to Measure CL 263222 and CL 263284 Residues in Cattle Muscle, Kidney, Liver Tissue, Milk, Bovine Milk Fat, and Tissue Fat and Multiresidue Method". (MRID 448177-10, not available electronically).

Pesticide Petition #s: 9F05092.

Product Application: Grass

Limit of Quantitation (LOQ): 0.50 ppm - grass forage and hay

Limit of Detection (LOD): 0.20 ppm - grass forage and hay

Method Trial Reports: See Attachment 2

Notes & Special References:

**Attachment 2: Petition Method Validation Report; D271928, A.J.  
Krynitsky, 13-MAY-2002.**