



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

FEB 13 1996

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM:**

**SUBJECT:** 5F4440/5H5713. Clethodim in/on Alfalfa, Dry Beans, and Peanuts. Request for ACB Pre-review of Analytical Method. CBTS#'s 16,844 and 16,845. DP Barcodes D222965 and D222967. MRID#'s 434482-01, 434482-02, and 434482-03.

**FROM:** José J. Morales, Chemist  
Tolerance Petition Section II  
Chemistry Branch I -- Tolerance Support  
Health Effects Division (7509C)

**THROUGH:** Ed Zager, Acting Chief  
Chemistry Branch I -- Tolerance Support  
Health Effects Division (7509C)

**TO:** Don Marlow, Branch Chief  
Analytical Chemistry Branch  
Biological and Economic Analysis Division (7503W)

CBTS is requesting the Analytical Chemistry Branch to pre-review, without method validation, the enclosed analytical method for clethodim determination in/on alfalfa, peanuts, and dry beans. CBTS would like to have ACB's comments on the adequacy of the methodology. Please note the high apparent residues in control samples, the erratic recovery values, and the chromatographic data suggesting that there were problems in the cleanup steps of the method.

Enclosed please find copies of the following methods:

"Determination of Clethodim Residues in Alfalfa Commodities by the Confirmatory Method, EPA-RM-26D-2"; 10/13/94; J. C. Lai; Laboratory Project ID: VP10269; Performing Laboratory was Valent U.S.A. Corporation, Valent Dublin Laboratory, Dublin, CA (MRID# 434482-01).



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"Determination of Clethodim Residues in Dry Bean Commodities by the Confirmatory Method, EPA-RM-26D-2"; 10/13/94; J. C. Lai; Laboratory Project ID: VP10905; Performing Laboratory was Valent U.S.A. Corporation, Valent Dublin Laboratory, Dublin, CA (MRID# 434482-02).

"Determination of Clethodim Residues in Peanut Commodities by the Confirmatory Method, EPA-RM-26D-2"; 10/11/94; J. C. Lai; Laboratory Project ID: VP10697; Performing Laboratory was Valent U.S.A. Corporation, Valent Dublin Laboratory, Dublin, CA (MRID# 434482-03).

If you have any questions please contact Elizabeth T. Haeberer (305-5374) or José J. Morales (305-5010).

cc without attachments: RF, Circu., José J. Morales, E. Haeberer, J. Miller/D. Kenny (RD, 7505C), PP#5F4440/5H5713

7509C: Reviewer (JJM): CM#2: Rm 804-Q: 305-5010: typist (JJM): 2/12/96

RDI: E. Haeberer (2/13/96): R. Loranger (2/13/96): E. Zager (2/13/96)