West 701 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BRCB reading file

MAY 1 5 1996

## **MEMORANDUM**

SUBJECT: Review of 6a2 Submission on Clethodim (121011)

D225940

FROM: Daniel Rieder, Team Leader Biologist

Environmental Risk Characterization Branch Environmental Fate and Effects Division 7507C

THRU: Elizabeth M. Leovey, Chief

Environmental Risk Characterization Branch Environmental Fate and Effects Division 7507C

TO: Joanne Miller, PM 23

Herbicide/Fungicide Branch Registration Division 7505C

The registrant of Clethodim, Valent USA Corp., has submitted information (letter dated January 2, 1996) on the formation of 3 new transformation products formed from clethodim in an aqueous photolysis study. They are identified as DMESO2, TET, and DMEK. These transformation products had apparently not been detected in previous environmental fate studies. According to the letter, these would not be considered to be "major" degradates; since none of them "was found to account for more than 7.5% of the radiocarbon in the test solution during the 30-day study."

Since this is just a letter, (the full studies are being translated, by Valent, from Japanese) and we do not know anything about the degradates (i.e. persistence, mobility, potential biological activity, etc.) there is insufficient information on which to base a conclusion that this indicates a significant new risk.

When the full study has been submitted and reviewed, the ERCB will re-evaluate whether these newly discovered degradates represent a risk.

If you have questions please contact Betsy Grim (305-7634) or Daniel Rieder (305-5314).

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