PMSD/ISB

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

OCT 25 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#9F3743. Clethodim (Select®)
Re: Analytical Methods and Reference Standards
DEB#: None HED#: None MRID#: 410301-41

FROM: Maxie Jo Nelson, Ph.D., Chemist
Tolerance Petition Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

mjn

THRU: Robert S. Quick, Section Head
Tolerance Petition Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

RSQ

TO: J. Miller/M. Erumsele, PM Team 23
Fungicide-Herbicide Branch
Registration Division (H7505C)

The P.M. is requested to advise the petitioner, Valent/Chevron, of the need for the following to facilitate DEB's review of this petition (new chemical/first food use):

1. The Agency plans to subject the proposed enforcement method for determining residues of clethodim and its metabolites in plant and animal tissues, **RM-26A-1** [MRID# 410301-41], to a method validation trial in our laboratories, using appropriate plant and animal commodity matrices.

   Prior to our doing this, however, the petitioner needs to revise the write-up of the method to incorporate directions for dealing with (i.e., sample preparation, extraction, et cetera as applicable) **animal** commodity matrices.

   DEB also requests the petitioner reexamine the over-all write-up of RM-26A-1, making whatever other revisions/ additions (if any) are deemed appropriate to ensure the completeness of all aspects of the detailed instructions for running the method.

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DEB notes the method also needs to be retitled to more accurately reflect its area of applicability.

DEB suggests the petitioner use the sethoxydim enforcement method found in the Pesticide Analytical Manual, Volume II, (PAM II), Pesticide Reg. Sec. 180.412, as a model in making the requested changes.

2. DEB requests the petitioner submit a complete list of the reference standards available for clethodim, its metabolites, and derivatives (DME, etc.).

3. A suitable quantity of each of the reference standards (and appropriate accompanying documentation) should be forwarded at this time to the U.S. EPA Pesticides and Industrial Chemicals Repository, U.S. EPA Environmental Research Center, Research Triangle Park, North Carolina, 27711.

4. Analytical Method RM-26A-1 is essentially the same method used to analyze residues associated with the registered active ingredient sethoxydim [40 CFR 180.412]. Known as a "common moiety" method, it is incapable of distinguishing residues resulting from application of sethoxydim from those associated with clethodim.

   By letter dated 8/14/89, the petitioner informed the Agency that a compound-specific method for confirmatory purposes (in enforcement) was under development.

   DEB requests an estimated date of submission for this compound-specific confirmatory method.

   DEB advises the petitioner the write-up of this confirmatory method should also be detailed and complete, as this method is also subject to method validation in our laboratories and is intended for publication in PAM II, along with RM-26A-1.

CONCLUSIONS/RECOMMENDATION

1. The PM is requested to send a copy of this memo in toto to the petitioner, Valent/Chevron.

2. The PM should advise the petitioner to send in the information/revisions requested in #s 1, 2, and 4, above, as amendment(s) to this petition.

3. Method validation trial(s) for this petition will be held in abeyance pending adequate response on these issues by the petitioner.

4. Since considerable lead time is needed to schedule and run method validation trials in our laboratories, and since such trials must be successfully completed prior to any Agency favorable recommendation for the proposed tolerances, it behooves the petitioner to respond to this memo in a timely fashion.

cc: M. Nelson, Reading File, Circulation (7), PP#9F3743, R. Schmitt, ISB/PMSD (E. Eldredge).

H7509C:DEB:Reviewer(MJN):CM#2:Rm804:557-7423:typist(mjn):
3743CLET.AM1:10/24/89.

RDI:SecHead:RSQuick:10/24/89:BrSrScientist:RALoranger:10/25/89.