

C. F. Kellum
FOD/PLB



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

SEP 27 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: FAP#1H05614. Clethodim (Select® 2EC Herbicide) in or on soybean soapstock and cottonseed meal.
Amendment of 9/9/91
MRID No.: None, CB No.: 8509.
DP Barcode: D168631

FROM: William D. Wassell, Chemist
Tolerance Petition Section I
Chemistry Branch I - Tolerance Support
Health Effects Division (H7509C)

W.D. Wassell 9/26/91

THROUGH: R. W. Cook, Acting Section Head
Tolerance Petition Section I
Chemistry Branch I - Tolerance Support
Health Effects Division (H7509C)

R.W. Cook

TO: Joanne Miller, PM - 23
Fungicide-Herbicide Branch
Registration Division (H7505C)

and

Toxicology Branch II - HFA Support
Health Effects Division (H7509C)

Summary of Deficiencies Remaining to be Resolved PP#9F03743:

- o Rewrite the clethodim compound specific method, RM-26D-1, per ACB recommendations.
- o Provide additional method validation data for the rewritten method for the same clethodim metabolites at the same fortification levels in the same matrices as were used in the EPA Petition Method Validation.

These deficiencies were cited in the F.D. Griffith, Jr. memo of July 30, 1991 (PP9F3743) and are not outlined in detail in this review.



Printed on Recycled Paper

Summary/Background:

Valent U.S.A. Corporation proposes the establishment of tolerances for the combined residues of the herbicide clethodim (ANSI), (E)-(±)-2-[1-[[[3-chloro-2-propenyl]oxy]imino]propyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one, and its metabolites containing the 2-cyclohexen-1-one moiety (calculated as the herbicide) in or on the following feed commodities:

Soybean Soapstock 15.0 ppm

Cottonseed Meal 2.0 ppm

This food additive petition was submitted as per CB's (formerly DEB) request of March 12, 1990 (memo of M.J. Nelson, PP9F03743). The residue data and other information (field trials, processing studies, analytical methods, etc.) were submitted and reviewed as part of PP9F3743. In the March 12, 1990 memo of Dr. Nelson deficiencies in relationship to the processing studies were cited. Most deficiencies have subsequently been resolved and the petitioner has submitted this request for the aforementioned feed additive tolerances. CB has been requested by RD to review only the Section F of this petition and RD will review the Section B uses and the confidential statements of formula (as per a phone conversation between Frank Sanders (RD) and Robert Quick (CBTS) on 9/25/91).

Conclusions:

1. This petition does not address the deficiencies cited in F.D. Griffith's memo of July 30, 1991 (PP9F3743). A detailed description of these deficiencies are not included in this review.
2. Soybean soapstock and cottonseed meal are animal feed items and therefore CBTS recommends for the tolerances to be placed in 40 CFR §186.
3. The tolerance levels should be stated as being calculated as the herbicide and the chemical name contains minor inaccuracies that should be corrected.

Recommendations:

Contingent upon favorable review of Section B of this petition and the Confidential Statement of Formula by RD, CBTS could recommend for the establishment of a tolerance with an expiration date, for combined residues of clethodim and its metabolites containing the 2-cyclohexen-1-one moiety in or on soybean soapstock at 15.0 ppm and 2.0 ppm in or on cottonseed meal, provided the deficiencies of PP9F3743 are resolved (that is, if the petitioner agrees to rewrite the compound specific method as suggested by ACB, generate the requested additional validation data, resubmit this method package for Agency review and additional

testing or revision as necessary.)

Detailed Considerations:

The petitioner proposes that 40 CFR §185 be amended to establish the aforementioned food additive tolerances. Soybean soapstock and cottonseed meal are animal feed items and therefore CBTS recommends for the tolerances to be placed in 40 CFR §186.

The residue levels are calculated as the herbicide and this should be included in the appropriate tolerance expression. Additionally, the chemical name of the herbicide in Section F contains minor inaccuracies; the chemical name should be listed as follows in the amended CFR sections:

(E)-(±)-2-[1-[[3-chloro-2-propenyl]oxy]imino]propyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one.

cc: WD Wassell, RF, Circ., PP#9F03743/FAP#1H05614, PIB/FOD (Furlow), Clethodim SF

H7509C:CBTS:WD Wassell:wdw:CM#2:Rm 814B:557-2135:9/25/91

RDI: RW Cook: 9/26/91: RA Loranger: 9/26/91
Disk-01:file:WDW-15