



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

C. Furlow

MAY 30 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: PP#9F3743 - Clethodim (Select®) in/on Soybeans,
Cottonseed, and Animal Commodities.
Supplementary Petition Method Validation Request for
the Compound Specific (Confirmatory) Method.
(MRID# 417307-01)[No DEB #]{No HED Project #}

FROM: Francis D. Griffith, Jr., Chemist
Chemistry Branch I-Tolerance Support
Health Effects Division (H-7509C) *Francis D. Griffith, Jr.*

THRU: Richard D. Schmitt, Ph.D., Chief
Chemistry Branch I-Tolerance Support
Health Effects Division (H-7509C) *Richard D. Schmitt*

TO: Donald A. Marlow, Chief
Analytical Chemistry Branch
Biological and Economic Analysis Division (H-7503W)

This petition method validation (PMV) request is designed to supplement CB's May 9, 1991, revised PMV for clethodim metabolites and levels not previously tested. We reiterate that those portions of the February 22 and May 9, 1991, clethodim PMV requests that ACB indicated could be completed are to be completed.

The supplementary PMV is for clethodim Method RM-26D-1 (MRID #417302-01), which was sent to you as Attachment 4 in our February PMV request. The petitioner has now provided additional clethodim metabolite method validation data in his May 3, 1991, amendment. The study is titled "Attachment 1 Validation Data for S-Methyl Clethodim Sulfoxide in Milk." While these data were previously faxed to the lab we have attached 2 additional copies to this memorandum as Attachment 2. The petitioner has provided a HPLC retention times table for Method RM-26D-1 which is also part of this attachment.

The supplementary PMV for the compound specific or confirmatory method RM-26D-1 is for one chemical (S-methyl clethodim sulfoxide) in milk. This supplementary PMV should be our final PMV request for the clethodim compound specific method,



Printed on Recycled Paper

RM-26D-1 and methods to enforce the proposed tolerances for PP#9F3743.

Instructions for running and reporting the results of the PMV are the same as those in our May 9, 1991 PMV request and are incorporated herein by reference.

Attachments

1. Method Report Form (2 pages)
2. "Validation Data for S-Methyl Clethodim Sulfoxide in milk" and HPLC Retention Times for Method RM-26D-1".

cc (With All Attachments):

P. Corneliussen (FDA, HFF-426), R. Ellis (USDA/FSIS)

cc (With Attachment 1 Only):

R.F., Circu (7), Reviewer (FDG), PP#9F3743, M. Bradley (MTO File/PAM-II Co-Editor), J. Miller (PM-23), H.K.Hundley (ACB/BEAD), R. Thompson (RTP-NC).

H-7509C:CBTS:Reviewer(FDG):vg:5/24/91:CM#2:RM814:557-0826:ed:fdg:5/28/91.

RDI:SectHd:RSQuick:5/28/91:BrCh:RDSchmitt:5/28/91.

Attachment 1

Page 1 of 2

Method - Valent Analytical Method

"Confirmatory Method for the Determination of Clethodim and Clethodim Metabolites in Crops, Animal Tissues, Milk and Eggs," Method RM-26D-1, by J.C. Lai. dated December 14, 1990, 18 pages (MRID # 417307-01).

Please do not use control values for recovery corrections.

Please do not report control values as 0.0 ppm. Accurately state your limit of detection, and note any commodity coextractives that could change the recovery values reported. Also please confirm the petitioner's claim for his limit of detection (or sensitivity) in milk at 0.02 ppm.

<u>Commodity</u>	<u>Chemical Added*</u>	<u>ppm Added</u>	<u>ppm Found</u>	<u>% Recovery</u>
Milk	S-MeCSO	0.0 (control)		
		0.02		
		0.05		

*S-Me CSO = S-Methyl Clethodim Sulfoxide

Modifications to Method (Major or Minor):

Special Precautions to be Taken:

Sources of Analytical Standards:

If derivatized Standard use, give source:

Instruments for confirmation:

If instrument parameters differ from method given, please list parameters used:

Commercial Source for any special Chemicals or Apparatus:

Comments