



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

JAN 4 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#9F3743 - Clethodim (Select®) in/on Soybeans, Cottonseed, and Animal Commodities. Review of the October 17 and August 23, 1990 Amendments. (MRID No. 416850-01) [DEB Nos. 7496 and 7500] {HED Project No. 1-0391}

FROM: Francis D. Griffith, Jr., Chemist
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TO: Joanne I. Miller, Acting PM-23
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THRU: Robert S. Quick, Section Head
Tolerance Petition Section I
Chemistry Branch I - Tolerance Support
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RM

Valent USA Corporation has submitted these amendments consisting of a cover letter and supplementary Section D (revised analytical method and secondary laboratory validation data) in response to deficiencies outlined and summarized in our May 4, 1990 review by M. J. Nelson. These data were initially submitted to CBTS in November 1990 and previously reviewed (see memorandum of December 13, 1990 by F. D. Griffith, Jr.). Upon further consideration Chemistry Branch concludes these data are duplicate copies of data previously reviewed.

Chemistry Branch reiterates the Executive Summary of Chemistry Deficiencies, Conclusions 1, 2 and 3, and Recommendation of our December 13, 1990 review (which see). The data on second lab validation of the confirmatory clethodim method and justification for use of diazomethane as the methylating agent in the primary enforcement method are returned to the PM.

cc: R.F., Circu (7), Reviewer (FDG), PP#9F3743, R.D. Schmitt, PhD., Chief, PIB/FOD(C. Furlow).
H7509C:CBTS:Reviewer(FDG):CM#2:Rm814B:557-0876:mjk:1/4/91:ed:
fdg:1/491.
RDI:SecHd:RSQuick:1/4/91:BrSrSci:RALoranger:1/4/91.