C. Fairbanks
PIB/FOD

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

MAY 9 1991

EXPEDITE

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#9F3743 - Clethodim (Select®) in/or Soybeans, Cottonseed, and Animal Commodities.
Review of Request for Harmonization of Clethodim Tolerance with Sethoxydim Tolerances.
(No MRID#) [DEB#7922] (HED Project #1-1143)

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

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

TO: Joanne I. Miller, PM-23
Fungicide-Herbicide Branch
Registration Division (H-7505C)

and

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

In the April 19, 1991 letter signed by Richard H. Stanton, Federal Registration and Regulatory Affairs Manager, Valent proposes amending PP#9F3743 to harmonize the proposed clethodim tolerances with the existing sethoxydim tolerances. The petitioner contends this approach will eliminate their problems with the compound specific method development, and its petition method validation by EPA. CB reiterate that the common moiety method that measures clethodim and its metabolites and/or sethoxydim and its metabolites as DME, DME-OH, and S-MeDME has had a successful PMV, and partly satisfies our residue analytical method requirements for tolerance enforcement.

CB does not agree that harmonizing clethodim and sethoxydim tolerances is justified. CB takes exception that different tolerance levels for clethodim and sethoxydim on the same raw agricultural commodity creates an unnecessary burden on enforcement Agencies. We recognize the petitioner initially

proposed harmonized clethodim and sethoxydim tolerances. However, it is Agency policy that we recommend for tolerances no higher than necessary. The tolerance difference between clethodim and sethoxydim is supported by crop field trial residue data on fuzzy cottonseed. The clethodim-sethoxydim tolerance difference for eggs is fully supported by ^{14}C-poultry metabolism and poultry feeding studies. The claim that there is no toxicological justification for a difference in tolerance levels is not in the purview of CB; rather this should be addressed by the appropriate Toxicology Branch.

The petitioner is proposing adding a label restriction on use of Poast® and Select® on the same crop during that crop's growing season. CB contends this restriction does not prevent dual chemical use. It does warn users of the possible dangers of illegal residues, and will definitely help enforcement agencies in their investigations of pesticide misuse.

The petitioner contends that if harmonization of clethodim and sethoxydim tolerances were accomplished, then the need for a compound specific method becomes moot. The request to harmonize clethodim and sethoxydim tolerance in eggs and cottonseed should be rejected. CB can not recommend for this request for reasons stated above.

The petitioner has submitted additional validation data for the compound specific method with the letter dated May 3,1991. These data will now be reviewed by CB-TS and if found adequate will enable ACB/BEAD to proceed with the petition method validation (PMV) for the compound specific method, RM-26D-1. Sucessful completion of this PMV is the last chemistry requirement for this petition.

cc: R.F., Circ(7), PP#9F3743, Reviewer(FDG), TOX, H.K.Hundley (ACB-Beltsville), PIB/FOD(Furlow).

H-7509C:CBTS:Reviewer(FDG):vg:5/1/91:CM#2:Rm814B:4557-0826:
edit:fdg:5/2/91.

RDI:SecHd:RSQuick:5/8/91:BrSrSci:RALoranger:5/8/91.