



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

EXPEDITE

SEP 9 1991

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: PP#9F3743 Clethodim on Soybean, Cottonseed and Animal
Commodities. Review of Federal Register Notice.
(No MRID#) [CBTS#8464] (HED Project #1-2138A)

FROM: Francis D. Griffith, Jr., Chemist *R. J. Quick for*
Analytical Chemistry Branch
Biological and Economic Analysis Division (H7503C)

THRU: Robert S. Quick, Acting Chief
Chemistry Branch I-Tolerance Support
Health Effects Division (H7509C) *Robert S. Quick*

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

RD requests CBTS concurrence and comments on the proposed clethodim FR Notice to establish an interim tolerance.

Conclusion

The proposed FR Notice for Clethodim should be revised as detailed in the body of this review.

RECOMMENDATION

CBTS does not concur on the proposed clethodim FR Notice to establish an interim tolerance.

Detailed Considerations

At the beginning of this FR Notice there is only PP#9F3743 cited. There is no corresponding FAP#. A feed additive petition number is required in order to establish soybean soap stock and cottonseed meal tolerances in 40 CFR 186.xxxx. Was a feed additive petition filed?

In the summary section after the chemical name, RD needs to insert "and its metabolites containing the 2-cyclohexene-1-one moiety". There needs to be a separate paragraph proposing clethodim and its metabolites feed additive tolerances on soybean soap stock and cottonseed meal. These are not rac's.



Printed on Recycled Paper

In the supplementary information section, we note that the initial proposed tolerances were amended by CB request. There should be 2 notices of filing: an initial and a supplementary filing. Please note there are more than one tolerance being proposed. There should be a date when the FAP was proposed.

On page 3, again tolerance should be plural.

On page 4, CB does not believe that there should be a 2 year interim proposal. The interim tolerance should probably be for 1 year. Then if necessary, the company can request an extension explaining why and detailing progress toward resolving the deficiencies.

Please see changes on page 4. Desirable data are lacking. The HPLC procedure is semi quantitative not qualitative.

On page 6, again it is plural tolerances.

RD needs to have an item 3. a new 186. _____
for soybean soap stock
cottonseed meal
Also delete these from the 2. new 180. _____

cc:PP#3743, RF, Circ.