



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

DEC 16 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command<sup>®</sup> Technical (EPA Reg. No. 279-3052) and Command<sup>®</sup>  
4 EC Herbicide (EPA Reg. No. 279-3053). Storage  
stability in RACs and Soils. MRID No. 406333-01.  
Branch Nos. 4510 & 4511.

FROM: Kenneth W. Dockter, Chemist  
Special Registration Section I *Kenneth W. Dockter*  
Dietary Exposure Branch  
Health Effects Division (TS-769C)

THRU: A.R. Rathman, Section Head  
Special Registration Section I *ARR*  
Dietary Exposure Branch  
Health Effects Division (TS-769C)

TO: James R. Yowell, PM Team # 25  
Registration Division (TS-767C)

FMC Corporation has submitted additional storage stability data determining the stability of Command<sup>®</sup> [2-(2-chlorophenyl)methyl-4,4-dimethyl-3-isoazolidinone; proposed common name = clomazone] residues in cottonseed, soybeans, tobacco, and soils. We defer to EFED for review of the soil data. The initial analyses (after 0, 3, and 6 months of frozen storage) showed no decline over the six month interval, which see J. Worthington 9/24/84 review; PP#4F3128. Current data reflects about 40 months of storage.

This laboratory study involved macerated commodities fortified with 0.2 or 0.5 ppm clomazone, dark frozen storage (-18°C), and analysis after 12, 24, and 40 months using a referenced residue GC/NP method. The analytical method included an acid reflux step, hexane partition, sodium bicarbonate wash, and Florisil column clean-up. The method detectability and sensitivity were 0.05 and 0.2 ppm, respectively. All samples showed no detectable decline in levels over the forty month interval; 15 months for cottonseed, a late addition to the study. Therefore, these data are adequate to show that the degradation of clomazone residues in experimental samples is not a problem.

858

cc: K. Dockter (DEB), Command S.F., PP# 4G3128, EFED, E.  
Eldredge (ISB/PMSD), Circulation (7), RF.  
RDI: ARRathman:12/15/88:RDSchmitt:12/15/88  
TS-769:DEB:CM#2:RM 802:77886:K.W. Dockter:edited by Kd:12/15/88