PP# 3796

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

MAR 9 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#s 9F03796, 0F03860, 3F04238, and 4F04343. Glyphosate-trimesium (formerly known as Sulfosate) in or on corn, soybeans, citrus fruit, stone fruit and the nut crop group (except almonds). **Revised Experimental Design for Petition Method Validation.** MRID#s 432736-04 and -05. Barcodes D212118 & D197108. Chemical No 128501. CBTS#s 15106 & 12882.

FROM: G.F. Kramer, Ph.D., Chemist
Tolerance Petition Section III
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C)

THRU: E. Zager, Acting Branch Chief
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C)

TO: Donald A. Marlow, Chief
Analytical Chemistry Branch
Biological and Economics Analysis Division (7503C)

Zeneca has submitted applications to establish the following tolerances for N-(phosphonomethyl)glycine as a result of application of the trimethylsulfonium salt (glyphosate-trimesium or Sulfonium, trimethyl- salt with N-(phosphonomethyl)glycine (1:1)): corn grain- 0.05 ppm; corn forage and fodder- 0.1 ppm; soybean seed- 2.0 ppm; soybean forage- 1.0 ppm; soybean hay- 3.0 ppm; citrus fruit- 0.5 ppm; stone fruit- 0.05 ppm; and the nut crop group (except almonds)- 0.05 ppm.

CBTS previously requested that ACL perform an ILV of TMS method RR 93-105B (MRID# 432736-04) in support of the stone fruit, citrus fruit and nut petitions (Memo, G. Kramer 2/17/95). We are now requesting that the experimental design of the PMV be amended to include corn and soybean RACs and drop peaches and dried prunes. Note that the method and ILV were included with the previous Memo.

Please address your written reports to: R.B. Perfetti, Acting Section Head, Tolerance Petition Section III, Chemistry Branch I, Tolerance Support, Health Effects Division (7509C)

Attachment 1- Experimental Design for PMV

Attachment 2- Validation data for soybean RACs from MRID# 414621-03

cc (with Attachment 1): M. Clower (FDA, HFS-335)
cc (with Attachment 1 only): PP#s 0F03860, 3F04238, and 4F04343, S.F., Kramer, circ., R.F., H. Hundley (ACB/BEAD), R. Taylor (PM25/RD)/R. Allen, R. Thompson (RTP-NC)
RDI: R.B. Perfetti (3/7/95), R.A. Loranger (3/7/95)
G.F. Kramer:804V:CM#2:(703)305-5079:7509C

ATTACHMENT 1

METHOD: Touchdown: Determination of Residues of the Trimethylsulfonium Cation in Agricultural Crops by Gas Chromatography. 12/30/93. By Y. Iwata. Zeneca. MRID# 432736-04

Please: (i) Indicate the limit of detection and quantitation; (ii) Do not use control values for recovery calculations; and (iii) Do not report control values as zero; if less than the limit of detection, report as such.

Commodity	Chemical Added	ppm Added	ppm Found	Percent Recovery
Pecans	TMS	0.00		
		0.05		
		0.10		
Corn Grain	TMS	0.00		
		0.05		
		0.10		
Soybean Hay	TMS	0.00		
		0.10		
		3.0		
		6.0		
Soybean Seed	TMS	0.00		
		0.05		
		2.0		
		4.0		
Oranges	TMS	0.00		
		0.05		
		0.5		
		1.0		

Modifications made to method (major or minor):

Special precautions to be taken:

Source of analytical reference standards:

If derivatized standards used, give source:

Instrumentation for confirmation:

If instrumentation parameters differ from the method as written, list parameters actually used:

Commercial source for any special chemicals or apparatus:

Comments:

Chromatograms: