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

FEB - 4 1990

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: PP#9F3714. EPA Reg. No. 8340-GI. Fenoxaprop-ethyl in or on Wheat. Amendment of August 21,1989. Amended Sections B and F and Responses to Deficiencies. Request for Method Validation for Proposed Commodities. MRID Nos 412233-01, 412085-02 and 412086-01. DEB Nos 5828 and 5829.

FROM: Joel Garbus, PhD., Chemist Joel Garbus
Permanent Tolerance Section III
Dietary Exposure Branch (H7509c)

THRU: Richard D. Schmitt, PhD., Chief Richard D Schmitt
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: D. Marlow, Chief
Analytical Chemistry Branch
Biological and Economic Analysis Division (H7503C)

Hoechst Celanese Corporation has requested the registration of Tiller Herbicide, a pre-mix, multiple active ingredient product containing fenoxaprop-ethyl, and proposed the establishment of permanent tolerances for the commodities wheat grain at 0.05 ppm (negligible) and wheat straw at 0.5 ppm for the combined residues of fenoxaprop-ethyl and its two major metabolites.

Tolerances are established (40 CFR 180.430) for combined residues of the herbicide fenoxaprop-ethyl and its metabolites in or on the raw agricultural commodities rice, cottonseed, peanuts, peanut hulls, and soybeans at 0.05 ppm. The enforcement method for these tolerances (HRAV-1a) was validated by the Analytical Chemistry Branch with soybeans as the matrix. (A. E. DuPuy, memo, 9/29/86) It was stated in the description of that method that the method with modifications was suitable for use with dry matrices such as rice and soybean straw.

The residue data supporting the present tolerance request was generated using method HRAV-4 that incorporates the modifications and is specifically described for use with wheat grain and straw.

DEB requests that a method validation be conducted using method HRAV-4 with wheat grain and wheat straw.

Samples should be run in duplicate at the suggested fortification levels. (See attached tables.) Two copies of the appropriate method, along with recoveries and sample chromatograms are attached.

Please return the requested information on the attached forms, together with other information concerning the method trial that we should be aware of including copies of chromatograms for representative control and tolerance level samples, standard curves, examples of sample calculations, and all data generated by your branch's SOP for method trials.

One of the purposes of conducting a method trial is to determine whether all necessary instructions are included in the submitted method. For this reason we are requesting that laboratory staff scientists not discuss this PMV with the petitioner. Any problems encountered should be documented and included in your report. The registrant will be informed of any deficiencies in the method and asked to resolve them.

Analytical standards are available for fenoxaprop-ethyl and its metabolites from the EPA repository. Standards and their derivitized forms are also available from Hoechst-Roussel Agri-Vet Co., Somerville, NJ.

Please forward the results of this method try-out to P. Errico, Section Head, Permanent Tolerance Section III, Dietary Exposure Branch.

attachment: Determination of HOE-033171 [Fenoxaprop-ethyl:2-(4-(6-Chloro-2-Benzoxazolyloxy)Phenoxy) Propanoate] and its Metabolites [HOE-053022 (Fenoxaprop): 2-(4-(6-Chloro-2-Benzoxazolyloxy)Phenoxy) Propionic Acid and HOE-054014: [6-Chloro-2,3-Dihydrobenzoxazol-2-one] in Wheat Grain, Wheat Forage, and Wheat Straw (Winter and Spring Wheat) and Wheat Grain Process Fractions

cc with attachment (2 copies of method): D. Marlow [1 copy], P. Corneliussen (FDA, HFF426) [1 copy]

cc without attachment: R.F.; Circ.; M. Bradley (PAM-2 editor); Thompson; MTO F; Garbus; PM-23; K. Kissler; W.Bontoyan; PP#8F3607 ;PMSD/ISB (Eldredge)

RDI:PE:1/31/90:RAL:1/31/90
H7509c:DEB:JG:jg:2/1/90:CM#2:803a:557-1405

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