



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

AUG 29 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID# 000279-EUP-RGR. Sulfentrazone - Review of 6/1/94 meeting with FMC. Barcode D206086. Case 034954. CBTS# 14155.

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THRU: P.V. Errico, Section Head *P.V. Errico*
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TO: JoAnne Miller, Product Manager
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On June 1, 1994, G. Kramer and R. Loranger of CBTS met with representatives of FMC concerning results of the confined rotational crop studies and deficiencies in the metabolism studies for the new herbicide, sulfentrazone (Memo, G. Kramer 6/6/94). FMC has submitted their minutes of the meeting for our review. We find these minutes to be generally acceptable. However, the following point needs clarification:

1) **Characterization of polar residues:** This issue concerns the characterization of the residues from the metabolism study which elute at or near the solvent front during HPLC characterization (i.e., polar residues). The registrant states that "Demonstrating that the polar radioactivity is a large 'blob' of unseparated, early-eluting material may be adequate." However, as stated in our Memo of 6/6/94, "Characterization of polar metabolites should include chromatographic separation." Thus, CBTS is requesting that the registrant analyze the polar residues under chromatographic conditions which resolves the 'blob' into its individual components. If none of these components exceeds 10% of the TRR or 0.05 ppm, then further identification will not be required.



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cc: PP# 3G4272, S.F., Kramer, circ., R.F.
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