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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP# 5G04507. AC 303630 (Alert) in or on Oranges and Lemons. Results of Petition Method Validation (PMV). MRID# 436221-02. Barcode D222327. Chemical No 129093. CBTS# 16746.

FROM: G.F. Kramer, Ph.D., Chemist
Tolerance Petition Team I
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THRU: E. Zager, Acting Branch Chief
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Health Effects Division (7509C)

TO: Dennis Edwards, Product Manager
Meredith Johnson, Team 19 Reviewer
Registration Division (7505C)

American Cyanamid Company has petitioned for an experimental use permit (EUP) and temporary tolerances for residues of the insecticide/miticide AC 303630 [4-bromo-2-(chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile] as follows: Oranges -- 0.5 ppm; Lemons -- 0.5 ppm. The miticide Alert is also known as Pirate, containing the a.i. CL 303,630 or AC 303630.

On 7/18/95, CBTS requested that ACL perform a PMV on the following method:

Pirate (CL 303,630) GC Determinative and GC/MS Confirmatory Method for the Determination of CL 303,630 Residues in Whole Oranges, Wet Pulp, Juice, Dried Pulp, Molasses and Oil. Appendix A of Exhibit 1 of MRID# 436221-02.

The results of the PMV and the TMV Pre-review are appended to this memorandum as Attachments 1 & 2.



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Results

The average recovery in citrus oil was $89.2 \pm 11.7\%$ and in oranges, was $93.9 \pm 5.9\%$. One analyst can extract and clean-up six samples in 8 hours.

Conclusions

The recoveries of AC 303630 are acceptable. The following comments were made by ACL in the PMV results (Memo, A. Krynitsky 1/22/96):

- 1) The AC 303630 standard is not available from the EPA repository in RTP.
- 2) The extraction volume should be corrected for the percent moisture of the matrix.

The following additional comments were made by ACL in the TMV Pre-review (Memo, P. Golden 8/16/95):

- 3) SPE cleanup- A statement should be made as to whether the column is allowed to go dry between additions of eluant.

This method will be suitable for enforcement purposes once the revisions recommended by ACL are incorporated.

Recommendations

For the permanent tolerance petition, the petitioner should submit a standard of AC 303630 (conclusion 1) with accompanying MSDS to the EPA repository in RTP and send a revised version of the proposed analytical enforcement method to CBTS as specified in conclusions 2-3. Until the receipt of the standard and the revised method, the requirements for analytical enforcement methodology will remain unfulfilled.

Attachment 1- Memo, A. Krynitsky 1/22/96

Attachment 2- Memo, P. Golden 8/16/95

cc (with Attachments): M. Clower (FDA, HFS-335)
cc (w/o Attachment): PP#5G04507, S.F., Kramer, Circ., R.F., H. Hundley (7503W)
RDI: TPT1 (2/27/96), E. Zager (2/29/96), R.A. Loranger (2/27/96)
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