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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CERTIFIED MAIL

Karen R. Blundell
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**SUBJECT: Nature of the residue studies for rice and peanuts for
reregistration of sodium acifluorfen, chemical code
114402**

Dear Ms. Blundell:

This letter is in response to your submission of supplemental data for guideline requirement 171-4(a), nature of the residue in peanuts and rice, for the reregistration of sodium acifluorfen. We have reviewed these data, MRIDs 428658-01, 428658-02, and 431820-01 and our conclusions are summarized below.

GDLN 171-4(a) Nature of the Residue in Peanuts MRID 428658-02

In MRID 428658-02, you submitted data on initial sample TRRs and radioactivity in each fraction, which indicate only minor losses during extraction. This deficiency is satisfied.

MRID 428658-02 also supplied representative chromatograms from HPLC System II as requested and this deficiency has been resolved.

You reported that a new peanut metabolism study was initiated to resolve remaining deficiencies cited in our letter of May 24, 1993. Your May 12, 1994 letter indicates that the final report will be submitted by June 30, 1994.

GDLN 171-4(a) Nature of the Residue in Rice MRID 428658-01
MRID 431820-01

MRID 428658-01 was submitted to provide data to resolve deficiencies cited in our letter of May 24, 1993. These data have been reviewed and indicate consistency in HPLC mobility of standards and explain the assignment of residues in rice grain. These data deficiencies are now resolved.



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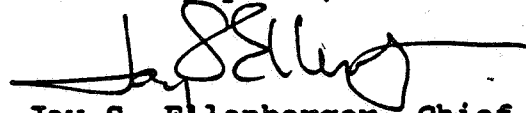
MRID 431820-01 was submitted March 31, 1994 to resolve problems with the organosoluble fraction of rice hulls. These data indicate that 5.3 to 7.0% (0.008 to 0.011 ppm) of the organosoluble residues from rice hulls are acifluorfen. This previously reported deficiency has been resolved.

Acifluorfen represents the large majority of TRR in rice straw. Polar peak 1 (total of 18% TRR, 0.36 ppm) represents most of the remaining TRR. If Polar peak 1 cannot be resolved into multiple peaks with a second system (a different HPLC system would be acceptable in this regard), then it must be identified. Other than Polar peak 1, no further work on unidentified peaks or fractions from rice straw is necessary. This deficiency cited in our previous review is not yet satisfied.

The nature of the residue in rice is not yet adequately understood. Further work in rice is necessary. This further work encompasses revised recovery methods as well as additional storage stability data. These additional storage stability data will be submitted by March 31, 1996 as proposed in your May 20, 1994 time extension request. As discussed in our May 17, 1994 meeting, approval of this time extension is pending.

Refer to the enclosed reviews for additional details. If you have questions regarding this letter, please call the Chemical Review Manager, Tom Luminello, at (703) 308-8075.

Sincerely yours,



Jay S. Ellenberger, Chief
Accelerated Reregistration Branch
Special Review and
Reregistration Division

Enclosure

cc: Joanne Miller, PM-23
John Abbott, HED
Steve Knizer, HED