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

SEP 16 1994

MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Sodium Acifluorfen. Case No. 2605. Ruminant Metabolism Study With Carbon-14 Labeled in the Nitrophenyl Ring - Waiver Request. No MRID No. CBRS No. 14182. DP Barcode: D206424.

FROM: Leung Cheng, Chemist
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

THROUGH: Andrew R. Rathman, Section Head
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

TO: Thomas Luminello, Jr., CRM 52
Accelerated Reregistration Branch
Special Review/Reregistration Division (7508W)

BASF Corporation has requested to waive or reserve the second part of the ruminant metabolism study in which sodium acifluorfen is labeled in the nitrophenyl ring with carbon-14.

The registrant contends that study results from the carbon-14 labeled sodium acifluorfen in the chlorophenyl ring show no evidence of ring cleavage of acifluorfen in goats. In addition, BASF apologizes for any confusion surrounding the proposed submission of a second study. Even though the registrant requested a time extension for the submission of the second study because of the difficulties encountered during the synthesis of the labeled compound, they argued that the second study was not initiated once it became apparent that an additional study was not needed to understand the qualitative nature of the residue in ruminants.

Our 5/12/94 (L. Cheng) review concluded that acifluorfen, acifluorfen amino glucuronide, acifluorfen acetamide, acifluorfen amino, and acifluorfen amino methyl ester were identified in milk, fat, and muscle, and the same except acifluorfen amino methyl ester were identified in kidney and liver. Amounts of TRR that were identified were 55.3% in milk, 67.6% in fat, 59.5% in muscle, 84.8% in kidney, and 70.5% in liver. The remaining residue was analyzed

on HPLC and none of the separated components exceeded 5% TRR or 0.01 ppm. No components resulted from the breakup of the diphenylether bond were observed among the metabolites identified.

CBRS agrees with BASF that a second goat metabolism study in which acifluorfen that is labeled in the chlorophenyl ring is not needed at this time. We recommend the additional goat metabolism study be waived.

cc:Circ, SF, RF, List B File, Cheng
RDI:ARRathman:9/15/94:MSMetzger:9/15/94:EZager:9/16/94
7509C:CBRS:LCheng:CM#2:RM810D:9/14/94:03:ACIFLUORFEN\GOATWAIVER