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

FILE

JUN 19 1989

*Sent TO FMC
6-22-89
[Signature]*

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Clomazone (Command® Technical and Command® 4EC).
EPA Registration Nos. 279-3052 and 279-3053.
Review of Meeting Minutes of April 10, 1989 on
Clomazone Metabolism in Corn.
(No MRID No.) [DEB #5354] {HED Project #9-1471}

FROM: Francis D. Griffith, Jr., Chemist
Special Registration Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

Francis D. Griffith, Jr.

THRU: Andrew R. Rathman, Section Head
Special Registration Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

RR

TO: R. Taylor/J. Yowell, PM Team 25
Herbicide-Fungicide Branch
Registration Division (H7505C)

RD has requested a review of FMC's document and letter of understanding of the EPA/FMC meeting of 4/10/89 on the subject chemical's metabolism.

CONCLUSIONS

DEB has no significant additions/corrections to the 5/12/89 document submitted by FMC (signed by E. M. Cuirle, Senior Registration Specialist) as a summary of FMC's understanding of that discussion in the EPA/FMC meeting of April 10, 1989 for the metabolism of clomazone in corn.

RECOMMENDATION

DEB recommends the FMC letter/document cited above serve as the record of the minutes of EPA/FMC 4/10/89 meeting on the metabolism of clomazone in corn.

Detailed Considerations

Background

Representing the Agency were Jim Yowell (RD), Whang Phang and Clark Swentzel (TOX) and Andy Rathman and Dick Griffith (DEB). From FMC the representatives were Martin Fletcher, Robert Plett, Bob Robinson, and Eunice Cuirle.

Metabolism of Clomazone in Corn

FMC presented a slide show reviewing the metabolism of clomazone in soybean and corn, and in rats. FMC contends that since clomazone readily degrades in plants, there's minimal translocation, low levels in the plant with negligible levels in the grain, a similar metabolic profile in plants and the rat, then additional metabolism (livestock) should not be necessary. FMC also asked if the parent marker compound concept was satisfactory in soybean would it not also be acceptable in corn, if not what would be the residue of concern. FMC asked what are the criteria for determining the need for livestock metabolism studies.

FMC has captured our comments correctly in that DEB cannot at this stage of the review waive the need for livestock metabolism studies. Also we will review all written requests with supporting data. DEB did suggest additional work be done in the metabolism studies to free the high percentage of bound residue (water soluble and non-extractable) especially additional enzymatic steps as well as extractions at various pH's before the studies are submitted for review.

DEB does not consider this document to be the written request. The tables/slides are not sufficient for review without a supporting narrative. DEB does not substitute rat metabolism for bovine or poultry metabolism study.

H7509C:DEB:Reviewer(FDG):CM#2:Rm814B:557-0826:mb:6/12/89:
edited:fdg:6/19/89.

cc: R.F., Circu (7), Reviewer (FDG), Clomazone Sub. File,
PP#4F3128, ISB/PMSD (Eldredge).

RDI:SectionHead:A.R. Rathman:6/13/89:E.Zager:6/15/89.