

US EPA ARCHIVE DOCUMENT

SUBJECT: Revised Analytical Method for Quizalofop ethyl

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Handwritten initials and date: H P 4/6/94

The registrant (E.I. du Pont de Nemours and Company) has submitted a revised analytical procedure for the determination of the herbicide chemical Quizalofop ethyl in pesticide products (See letter of 10/25/93, Marie M. Chubb). The revision is in response to the EPA letter of 11/24/92 (R.J. Taylor, PM-25) which pointed out problems in the procedure which needed to be resolved.

The registrant's revised analytical procedure responds to the question on retention times (item a) by indicating that for the recommended chromatography column (Chromegabond MC-18), the elution pattern consists of first the active ingredient and then the internal standard. This is consistent with the results achieved by the Agency's method validation. Item(b) of the EPA letter confirms this elution pattern. This resolves the question on retention times.

In items (c & d) of the EPA letter, the registrant was informed that the active ingredient (ai) concentrations of the sample will, in some cases, be higher than the ai concentration of the standard solution. As a result, some of the peak responses would be beyond the standard calibration range. The revised procedure has changed the weights of the components so that the concentrations are within the standard calibration range. This resolves the question on concentrations of the active ingredient.

The equations in Sec. VI.F.6 of the analytical procedure have been revised to reflect changes indicated in the EPA letter of 11/24/92 (item e). This corrects the errors noted in the analytical procedure.

The registrant's revised analytical procedure contains the changes suggested in the EPA letter. This resolves the questions raised, and no additional information is needed.