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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#7G3479. Myclobutanil (RH-3866) on apples and grapes. Request for analytical standards.

FROM: Richard Loranger, Chemist *R. Loranger*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: Andrew Rathman, Section Head *ARR*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Lois Rossi/Larry Schnaubelt, PM Team 21
Registration Division (TS-767C)

We are in the process of requesting method trials for two analytical methods submitted by Rohm and Haas for measuring residues of the fungicide myclobutanil (RH-3866) and its metabolite RH-9090 in or on apples, grapes, and animal commodities. The registrant (Dr. Michael Morelli) has stated that analytical standards will be provided to our Beltsville lab in response to our oral request (R. Loranger, 6/25/87). However, Rohm and Haas wants a written request to send the standards to EPA's Chemical Repository in North Carolina. Therefore, we request that you write a letter to Rohm and Haas asking for the chemicals listed below to be sent to the following address:

Pesticide and Industrial Chemicals Repository
U.S. Environmental Protection Agency (MD-8)
Research Triangle Park, NC 27711

RH-3866; myclobutanil; alpha-butyl-alpha-(4-chlorophenyl)-
1H-1,2,4-triazole-1-propanenitrile

RH-9090; alpha-(3-hydroxybutyl)-alpha-(4-chlorophenyl)-1H-
1,2,4-triazole-1-propanenitrile

Two grams of the active ingredient (RH-3866) should be sent. For the metabolite, which is apparently difficult to synthesize, a smaller quantity is acceptable (0.5-1.0 gram).

As noted in §171-13 of the Residue Chemistry Guidelines, the registrant's letter of transmittal should include the assay of the standards, the analytical methods used, a statement of principal impurities, purification procedures, storage requirements, and special precautions for safe handling.

The registrant should be reminded that the submittal of these analytical reference standards is a requirement for registrations and experimental use permits under 40 CFR 158.125.

Therefore, we will not give a favorable recommendation for the temporary tolerances until the standards have been received by the Repository.

cc: Circu, RF, PP#7G3479, R. Loranger
RDI:Section Head:ARRathman:6/29/87:RDSchmitt:6/29/87
TS-769:RCB:557-7324:RAL:ral(3):CM#2:RM.810:Date:7/1/87