

US EPA ARCHIVE DOCUMENT



3989

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

APR 11 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

**SUBJECT:** PP#1F3989 (CBTS #'s 13001; Barcode #'s D197760).  
Fenbuconazole on Stone Fruit. Revised Enforcement Method  
(MRID #'s 430444-00 and 430444-01).

**FROM:** Nancy Dodd, Chemist *Nancy Dodd*  
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**THROUGH:** Debra Edwards, Ph.D., Chief *Debra Edwards*  
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**TO:** Cynthia Giles-Parker, PM #22  
Herbicide-Fungicide Branch  
Registration Division (7505C)

and

Albin Kocialski, Section Head  
Registration Section  
Chemical Coordination Branch  
Health Effects Division (7509C)

Rohm and Haas Company has submitted a revised enforcement method for fenbuconazole on stone fruits. This was submitted in response to CBTS's request that minor modifications be made to the enforcement method (PP#1F3989, N. Dodd, 10/25/93).

**CONCLUSION**

The deficiency regarding the enforcement method for stone fruits has been resolved by submission of the revised enforcement method with the requested minor modifications.

**RECOMMENDATION**

A satisfactory method trial has been conducted by EPA's Analytical Chemistry Laboratory for the method in Rohm and Haas Technical Report No. 34-90-47R (MRID #430444-01) on peaches. The method will be sent to FDA for publication in the Pesticide



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Analytical Manual (PAM) upon our recommendation for a permanent tolerance. CBTS is unable to recommend for the tolerance on stone fruit at this time since other deficiencies remain outstanding. These are being addressed in a separate review to be issued in the near future.

#### DETAILED CONSIDERATIONS

The deficiency regarding the enforcement method for stone fruit (PP#1F3989, N. Dodd, 10/25/93) is repeated below, followed by the petitioner's response and CBTS's discussion/conclusion.

#### Deficiency re. the Enforcement Method for Stone Fruit

A satisfactory method trial has been conducted by EPA's Analytical Chemistry Laboratory for the method in Rohm and Haas Technical Report No. 34-90-47 on peaches. However, the method should be revised to include the minor modifications (#1 through 4 below). The revised method should be submitted so that it can be sent to FDA for publication in the Pesticide Analytical Manual (PAM) upon our recommendation for a permanent tolerance. This deficiency will remain outstanding pending receipt of the revised analytical method.

The minor modifications to be addressed are listed below:

1. The grade of the 7.5 cm paper used for filtering the extract is not stated.
2. Recoveries are corrected for control sample response. The use of controls should be precluded.
3. The equation for calculating residues includes a recovery correction factor. This practice is precluded in a tolerance enforcement method.
4. The results and discussion section directs the analyst to evaluate the consistency of each lot of Florisil and silica gel. No instructions are given for running an elution profile of these absorbents in the case where standards are not sufficiently recovered.

#### Petitioner's Response to the Deficiency re. the Enforcement Method

A revised enforcement method ("Revised Residue Analytical Method for Parent RH-7592 and its Lactone Metabolites RH-9129 and RH-9130 in Stonefruit", Rohm and Haas Technical Report No. 34-90-47R, 12/8/93; MRID #430444-01) has been submitted.

CBTS's Discussion re. the Enforcement Method for Stone Fruit

1. The grade of the filter paper, ie., Whatman #3 filter paper (7.0 cm, qualitative), is now stated in Sec.III.A., "Chemicals/Supplies".

2. Recoveries were corrected for control sample response. The control background correction for fortification has now been removed (Sec.111.E.6a).

3. The equation for calculating residues included a recovery correction factor. The % recovery correction for residue data has now been removed (Sec.111.E.6b).

4. The results and discussion section directed the analyst to evaluate the consistency of each lot of Florisil and silica gel. Sec. 111.E.4a ("Standardization of Silica Gel elution") and Sec. 111.E.4c (Standardization of Florisil elution) have now been added.

CBTS's Conclusion re. the Enforcement Method for Stone Fruit

The deficiency regarding the enforcement method for stone fruits has been resolved by submission of the revised enforcement method with the requested minor modifications.

Attachment 1: Revised Method (Rohm and Haas Technical Report No. 34-90-47R, MRID #430444-01)

cc with Attachment 1: H. Hundley (ACB/BEAD)

cc without Attachment 1: RF, Circu., N. Dodd (CBTS),  
E. Haeberer (CBTS), W. Wassell (CBTS), PP#1F3989, PM #22,  
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