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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OPP OFFICIAL RECORD  
HEALTH EFFECTS DIVISION  
SCIENTIFIC DATA REVIEWS  
EPA SERIES 361

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MEMORANDUM

DATE: 21-JUN-2002

SUBJECT: **PP# 9F05092. Imazapic in Pasture and Rangeland Grasses. Results of Petition Method Validation (PMV).**  
Barcode D283477. Chemical 128943 & 129041. Case 291904. Submission S581930.

FROM: William H. Donovan, Ph.D., Chemist  
Registration Action Branch 1 (RAB1)  
Health Effects Division (HED) (7509C)

Handwritten signature of William H. Donovan in black ink.

THROUGH: G. Jeffrey Herndon, Branch Senior Scientist  
RAB1/HED (7509C)

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TO: Jim Tompkins/James Stone, PM Team 25  
Registration Division (7505C)

BASF Corporation submitted petitions requesting permanent tolerances in support of registration of the herbicide imazapic for use on pasture and rangeland grasses. A capillary electrophoresis (CE) method was proposed by the petitioner for tolerance enforcement and HED forwarded this method to the Analytical Chemistry Branch (ACB) for validation (D271474, W. Donovan, 17-JAN-2001).

ACB successfully validated the proposed enforcement methods for the determination of imazapic and its two metabolites CL 263284 and CL 189215 in/on grass hay, when including the conditions and substitutions as described in an addendum to their method validation report. The ACB-determined limit of quantitation (LOQ) for imazapic and each of its two metabolites in grass hay was 0.50 ppm. The ACB-determined limit of detection (LOD) was 0.20 ppm for each compound. These values are in accord with the LOQ value of 0.50 ppm reported by the petitioner (no LOD values were estimated). ACB recommended that the method along with ACB's addendum be forwarded to FDA and included in FDA's Pesticide Analytical Manual Volume II as a Roman Numeral method.

The results of the PMV review are appended to this memorandum as Attachment 1 (D271928, A.J. Krynitsky, 13-MAY-2002). On the basis of the PMV report, HED now considers the enforcement method deficiency for imazapic residues noted in the risk assessment document

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(D267227, W. Dykstra *et al.*, 01-AUG-2001) to be resolved.

Attachment 1 - D271928, A.J. Krynitsky, ACB #B01-(54-59).

cc: W. Donovan, F. Griffith (7503W)  
RDI: J. Herndon (21-JUN-2002), RAB1 Chemists (13-JUN-2002)  
W. Donovan:806R:CM#2:(703)305-7330

**Attachment 1:**  
**D271928, A.J. Krynitsky, ACB #B01-(54-59)**