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### Addendum No. 1 to MRID # 44165039

DER Study Title: Terrestrial Field Dissipation – Carfentrazone-ethyl (F8426) 50

DF Herbicide.

Guideline Number: 835.6100

### Reasons for changes:

- Clarification of ambiguous status to <u>Upgradeable</u>.
  - The independent method validation submitted in support of this study (MRID 44165043) was for a different analytical method than the method used in this study. Differences in the independently validated analytical method include that no methylene chloride partition was performed, the SPE extraction was performed prior to derivatization, the SPE column was eluted with ethyl ether instead of hexane:ethyl acetate, and an acetic anhydride/pyridine derivatization was performed.

Independent validation of the analytical method used in this field study is required to upgrade the study classification to "supplemental". Acceptable study data on these and additional field sites are needed in order to meet EFED's data needs under OCSPP Guideline 835.6100.

#### Addendum No. 1 to MRID # 44165043

DER Study Title: Independent Method Validation: Determination of F8426 and Its

Metabolites in/on Soil.

Guideline Number: 835.6100

## Reasons for changes:

- Clarification of ambiguous status to Acceptable.
  - o This independent laboratory validation (ILV) was for an analytical method different than that used in MRID 44165039 (see discussion above). The validated analytical method was later submitted under MRID 44419018. It should be noted that method recoveries for 3-OH-F8426-BAc (58% and 61%) were not quantitative at the limit of quantitation (LOQ) (5.0 μg/kg). It should also be noted that two



replicates were spiked at the LOQ and at 20x LOQ. OPPTS Guideline 850.7100 (April 1996) states that five replicates should be spiked at the LOQ and an additional five replicates should be spiked at 10x LOQ. Relative standard deviations were low for each analyte at each spiking level, however. Therefore, additional replicates would not be expected to change the validation results.

Addendum No. 1 to MRID # 44165049

DER Study Title: Cold Storage Stability of Significant F8426 Environmental Degradates on Soil: F8426-propionic acid, F8426-cinnamic acid, F8426-benzoic

acid, and F8426-chloropropionic acid.

Guideline Number: 835.6100

# Reasons for changes:

- Clarification of ambiguous status to Acceptable.
  - o No study deficiencies were noted.

Revised by: Greg Orrick

Date: 10-20-10

Secondarily reviewed by: R. David Jones, Ph. D. D. Date: 2-9-11