

Section A4.2(a) Analytical Methods for Detection and Identification

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Annex Point IIA4.2Method Validation for the Analysis of Sumithrin in Soil

Additional clean-up of the sample extract was performed using 15 g of activated Florisil contained in a glass chromatographic column. The residue in the flat bottom flask was dissolved in 3 mL of a mixed solvent (hexane/ethyl acetate, 20: 1, v/v). This was quantitatively transferred to the Florisil column using three additional 3-mL washes of the mixed solvent. The sample solution and rinses were allowed to percolate through the column until the solvent reached the top of the packing. The eluate was discarded. The Sumithrin was eluted from the column using 45 mL of the mixed solvent. The first 5 mL were discarded. The remaining 40 mL were collected in a flat bottom flask, concentrated to 1-2 mL using rotary evaporation and then transferred to a glass screw-capped culture tube using hexane. The solution was taken to dryness using N₂. The residue was dissolved in a known volume of toluene and quantitated using gas chromatography (GC) and a mass selective detector (MSD).

5.2 DetectionNon-entry field

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5.2.1 Separation methodGas Chromatography

Instrumentation used for the chromatography of Sumithrin was a Hewlett-Packard (HP) 5890A Series II GC equipped with a HP 5970 MSD. Samples were injected with a HP 7673 autoinjector. Data were obtained with a Unix system. General chromatography and MSD parameters are as follows:

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Column:

J & W Scientific DB-5, 30 m x 0.25 mm i.d. fused silica capillary with a film thickness of 0.25 µm. DB-5 is a 5 % phenyl and 95 % methyl silicone.

Temperatures:

Column: 95 °C for 0.75 min, 15 °C/min from 95 to 250 °C, 10 °C/min from 250 to 275 °C, hold for 7 minutes at 275 °C

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Injector: 225 °C

Transfer Line: 275 °C

Detector: 275 °C

Carrier: Helium at a flow of 30 cm/sec

Injection Volume: 2 µl

5.2.2 DetectorHP 5970 MSD

Acquisition Mode: Single ion monitoring (SIM), ions 123 and 183 monitored

Temperatures:

Detector: 275 °C

Carrier: Helium at a flow of 30 cm/sec

Electron Multiplier: 1600 to 2200

Purge: Purge turned on at 0.75 min

Elution Time: Isomers elute between 15.5 and 16.5 min

Data Acquisitions and Calculations

Peak heights and areas for ions with a mass of 123 and 183 for cis and trans Sumithrin were obtained with the Unix data system that controlled the operation of the mass spectrometer. The two ions were used at the elution time determined by the injection of reference standards.

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For calculation purposes, peak areas were used. Initial calculations were performed using the sum of the peak areas for ions 123 and 183 for each isomer. An interference was noted with the trans isomer for ion 123. Although this interference seemed insignificant, peak areas for ion 183 only for both ions were chosen to quantify the Sumithrin residues. Thus, the peak area along with the concentration of each isomer of Sumithrin (isomeric ratios of 19/81 of cis/trans) was entered into a quadratic formula to determine a regression curve. Peak areas of ion 183 found for each isomer for the unknown samples were then entered into the regression curve and the nanograms of each isomer were calculated. Sample weights and volumes were then entered into the following equation to determine the final ppm of each

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Annex Point ПА4.2

Method Validation for the Analysis of Sumithrin in Soil

isomer.

$$\text{ppm residue} = (\text{ng/mL detected} \times \text{final volume (mL)}) \div (\text{sample weight (g)} \times 1000)$$

Total Sumithrin was then obtained by adding together the total amount of cis and trans Sumithrin found in the unknown samples. Recoveries of fortified samples were determined by the formula:

$$\% \text{ recovery} = ((\text{ppm residue found} - \text{average ppm residue in control}) \div \text{ppm residue added}) \times 100$$

Linear regression was not used to construct the standard reference curves because a slight curvature was noted when plotting concentration versus peak area. Calculation of the regression curve was performed using a data software package obtained from Beckman Instruments entitled "Computerized Automated Laboratory Systems" (CALS). All other calculations were performed using the spread sheet program Quattro Pro. The residue level in the treated samples was also corrected for moisture content as follows:

$$\text{Corrected ppm, dry basis} = (\text{ppm wet basis} \div (100 - \% \text{ soil moisture})) \times 100$$

5.2.3 Standard(s)

The Sumithrin standard was a mixture of cis and trans isomers. The isomer ratio for cis:trans was 19:81. The Sumithrin standard was stored in a freezer when not in use. Solutions made from the standard were refrigerated when not in use. Details of the preparation of stock solutions and dilution of working standards are contained in the study raw data and are not presented in the study report.

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Refer to figure A4.2(a)-1 for a typical chromatogram of a Sumithrin calibration standard.

5.2.4 Interfering substance(s)

No substances are expected to interfere.

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5.3 Linearity

Non-entry field

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5.3.1 Calibration range

A calibration curves were prepared containing the following concentrations of cis and trans Sumithrin:-

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Refer to Figures A4 2(a)-5 and 6 for typical calibration lines.

5.3.2 Number of

Each standard was injected once.

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Section A4.2(a) Analytical Methods for Detection and Identification**Annex Point IIA4.2****Method Validation for the Analysis of Sumithrin in Soil**

measurement
s

5.3.3 Linearity

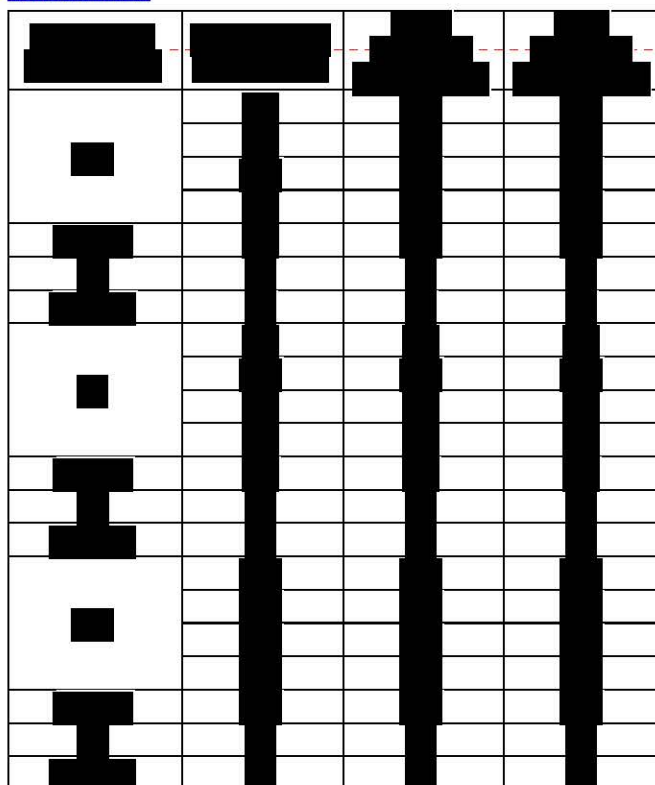
The detector response (area) for Sumithrin® was plotted against the standard concentration. The correlation coefficient was calculated to be 0.99904 for cis Sumithrin and 0.99922 for trans Sumithrin.

**5.4 Specificity:
interfering
substances**

No other substances were found to interfere. The controls were not found to contain any interfering peaks at the retention time of Sumithrin when quantified using the 183 amu ion.

**5.5 Recovery rates
at different
levels**

Refer to Figures A4.2(a)-2 and 3 for typical chromatograms of soil samples fortified with Sumithrin.

**5.5.1 Relative
standard
deviation**

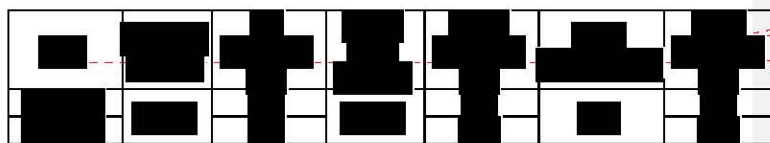
Refer to Section 3.5.

**5.6 Limit of
determination
n**

The limit of determination or LOQ was established to be 0.010 mg/kg. The limit of detection was 100 ng/ml for total Sumithrin.

5.7 Precision

Non-entry field

5.7.1 Repeatability

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Method Validation for the Analysis of Sumithrin in Soil

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methodsConclusionReliabilityAcceptabilityRemarksDateResults and
discussionConclusionReliabilityAcceptabilityRemarks*Give date of comments submitted**Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion.**Discuss if deviating from view of rapporteur member state**Discuss if deviating from view of rapporteur member state**Discuss if deviating from view of rapporteur member state**Discuss if deviating from view of rapporteur member state*

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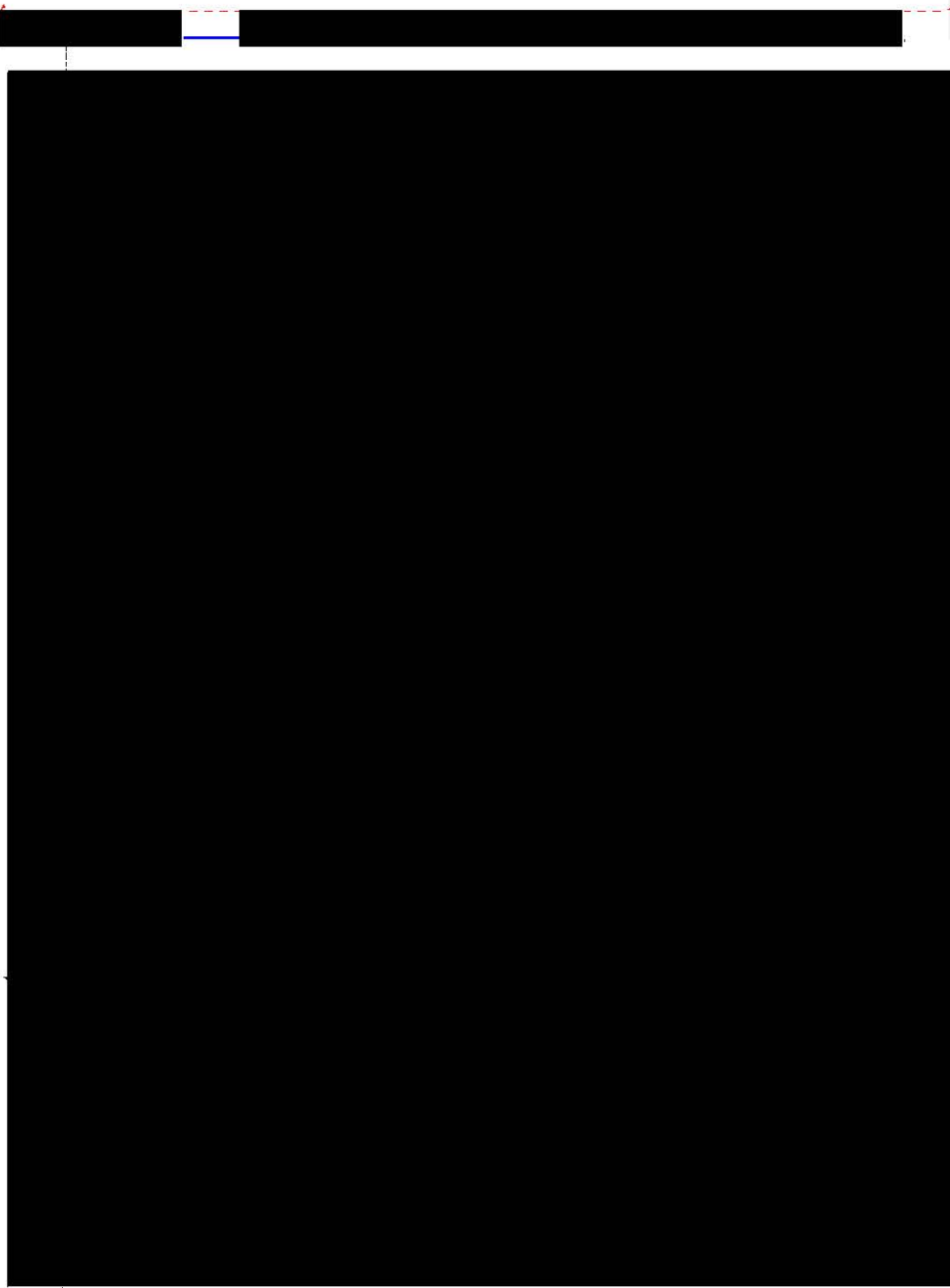
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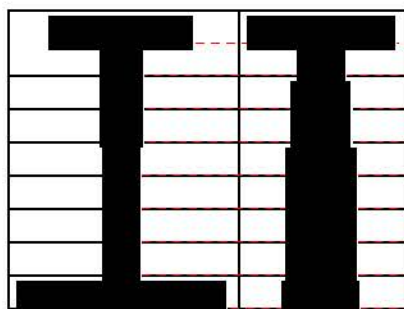
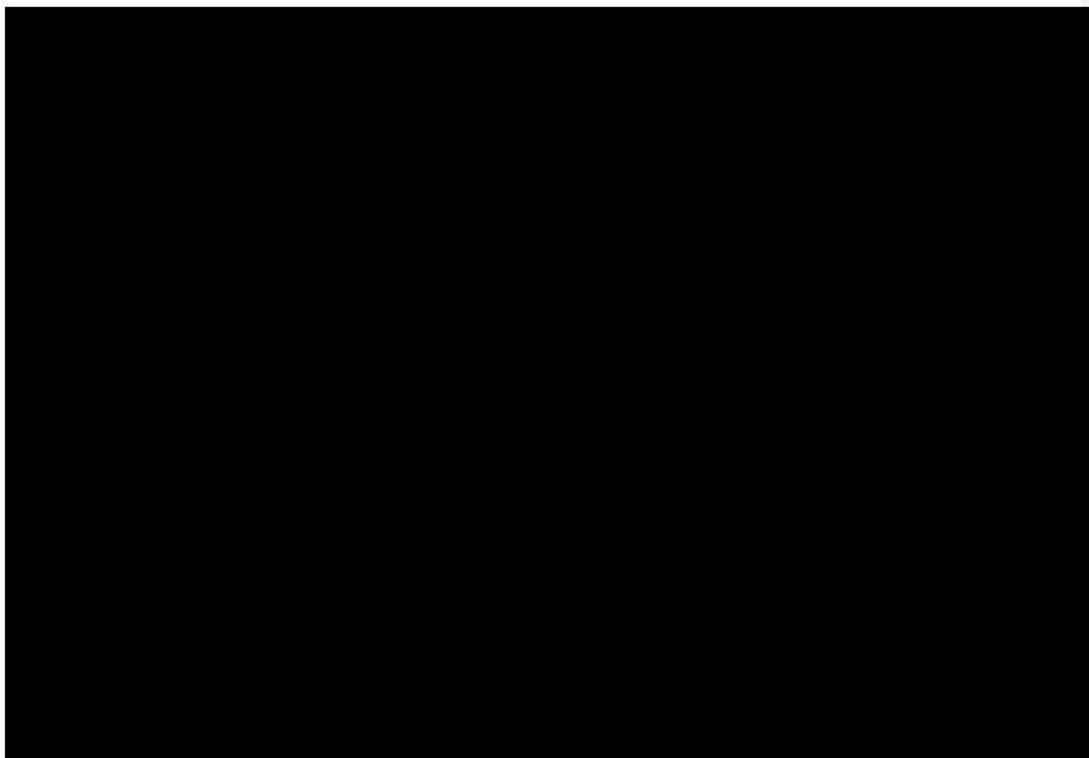
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Section A4.2(b) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Air

| | | |
|-------------------------------------|---|-------------------|
| | 37 REFERENCE | Official use only |
| 10.3 Reference |  | |
| 10.4 Data protection | Yes | |
| 10.4.1 Data owner | Sumitomo Chemical Co., Ltd. | |
| 10.4.2 Criteria for data protection | Data submitted to the MS after 13 May 2000 on existing a.s. for the purpose of its entry into Annex I/IA | |
| 11.1 Guideline study | 11 GUIDELINES AND QUALITY ASSURANCE Biocidal Products Directive (98/8/EC). The study design was based on the guidelines described in the EU Guidance document on residue analytical methods: Working document SANCO/825/00 rev.7 (17/03/04). | |
| 11.2 GLP | Yes | |
| 11.3 Deviations | None | |
| 12.1 Preliminary treatment | 12 MATERIALS AND METHODS Non-entry field | |
| 12.1.1 Enrichment | Preparation of Traps [1a/b, 4d] SKC air-sampling tubes (Catalogue Number 226-30-06, 11 cm x 0.8 cm diameter) are used for sampling. The tubes consist of a glass wool plug, 400 mg of XAD-2 resin, a further glass wool plug then a back-up of 200 mg of XAD-2 resin. The packing is retained with another plug of glass wool. Glass air-sampling tubes should be covered with aluminium foil to protect from light during sampling. Sampling Procedure [1a/b, 4a] Air is sampled by drawing air through the traps using a vacuum pump at a rate of 1 L/minute. Flow rate can be controlled using aquarium valves or flow restrictors on the interconnecting tubing. Air is drawn through the traps for six hours to give a total sample of 360 L of air through each trap. Record the temperature and relative humidity of the laboratory air at regular intervals during sampling. Analysis of the Traps [1a/b, 4d] <ol style="list-style-type: none"> 1. Unpack the rear portions of each trap and separately transfer the contents (including rear glass wool) to suitable glass sample vials. 2. Add 1 mL toluene to the remaining air trap and leave to soak through packing. Note: This is required to reduce possible loss of adsorbent particles when unpacking, due to static on the glass trap. | |

Section A4.2(b) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Air

3. Unpack the front portion of the trap (including front glass wool) separately into other vials. Note: The middle portion of glass wool should be included with the front portion of trap material.
4. Rinse the trap into the vial containing the front trap material with 9 mL toluene.
5. Sonicate for 10 minutes then filter the extract through glass wool into a glass tube.
6. Extract each portion of trap with a second 10 mL portion of toluene and sonicate for 10 minutes.
7. Combine extracts by filtering through glass wool.
8. Evaporate extracts to less than 10 mL volume under nitrogen in a TurboVap set at 45°C.
9. Transfer to a volumetric flask and dilute to the volume (minimum final volume of 10 mL) with toluene.
10. Analyse the extract by GC/MS using the instrumental conditions specified below.
11. Samples above an extract concentration of 0.5 µg/mL may not require evaporation. Instead, they may be diluted to a suitable volume with toluene, to obtain a concentration within the calibration range.

12.1.2 Cleanup No clean-up was required.

12.2 Detection Non-entry field

12.2.1 Separation method Instrumentation:-Trace GC Ultra Gas Chromatograph (Thermo Finnigan)
 Column#:-DB-17MS (15 m x 0.25 mm, 0.25 µm film thickness)
 Injection volume:-2 µL, splitless
 Injection temperature#:-250°C
 Carrier gas:-helium 1.5 mL/min
 Oven temperature program:-

| Rate (°C/min) | Temperature (°C) | Hold (min) |
|---------------|------------------|------------|
| - | 100 | 2 |
| 6 | 220 | 5 |
| 60 | 300 | 3 |

Note:-Parameters marked # may not be modified. Minor adjustments to the remaining parameters may be required in order to fully optimise the system.

12.2.2 Detector Detector:-Trace DSQ MS (Thermo Finnigan)
 Detector temperature:-200°C
 Ionisation mode#:-electron impact (EI+ SIM);
 Ions monitored#:-see below

| Compound | Retention times | Quantitation ion | Confirmation | Confirmation |
|----------|-----------------|------------------|--------------|--------------|
|----------|-----------------|------------------|--------------|--------------|

Section A4.2(b) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Air

| | (min) | (m/z) | ion 1 (m/z) | ion 2 (m/z) |
|--------------|-------|-------|-------------|-------------|
| d-phenothrin | 26.2 | 123 | 183 | 153 |

Note:-Parameters marked # may not be modified. Minor adjustments to the remaining parameters may be required in order to fully optimise the system.

12.2.3 Standard(s)

Preparation of Standard Solutions

Duplicate primary stock standard solutions of d-phenothrin are prepared in acetone.

Preparation of Stock Solutions

In duplicate, accurately weigh *ca.* 20 mg (corrected for purity) of d-phenothrin into separate 20 mL volumetric flasks and dilute each to the mark using acetone to give primary stock standards of concentration 1000 µg/mL d-phenothrin.

Fortification Solutions [1a/b, 4b]

Prepare a suitable fortification solution in acetone by serial dilution from the primary stock solution (1000 µg/mL in acetone).

| Concentration (µg/mL) | Volume (mL) | Final volume (mL) | Concentration (µg/mL) |
|--------------------------|----------------|-------------------------|--------------------------|
| 1000 | 1 | 10 | 100 |

Calibration Standards

Prepare appropriate calibration standards in toluene, from the primary stock solution (1000 µg/mL in acetone), to cover the range 0 to 0.5 µg/mL, with a lowest calibration level of 0.01 µg/mL.

Calculations

Residues of d-phenothrin are determined by the interpolation of the total peak areas of d-phenothrin from the standard regression equation, as follows:

The calibration line is determined by plotting the responses from the calibration solutions (R) against the amount of test substance injected (A) to generate a straight line graph.

$$R = B_0 + B_1 \times A$$

where B₁ is the gradient and B₀ is the intercept.

Concentrations of test substance (A) in sample extracts are calculated from their response using the equation:

$$\text{Concentration of extract A (µg/mL)} = (\text{peak area} - \text{intercept}) / \text{slope}$$

The residue of d-phenothrin in each test sample of air is calculated as follows:

$$\text{Residue (mg/m}^3\text{)} = \text{extract concentration (µg/mL)} \times \text{factor}$$

$$\text{Factor} = \text{final volume (10 mL)} \times \text{dilution factor (if required)} / \text{volume of}$$

Section A4.2(b) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Air

air (360L)

Procedural recovery data from fortified samples are calculated via the following equation:

$$\text{Recovery (\%)} = ((A-C)/S) \times 100$$

Where:-

A = concentration found in test sample (mg/m³ air)

C = concentration (or interference) found in control sample (mg/m³ air)

S = concentration added to fortified sample (mg/m³ air)

12.2.4 Interfering substance(s)

No substances are expected to interfere.

12.3 Linearity

Non-entry field

12.3.1 Calibration range

A calibration curve 0.01, 0.02, 0.05, 0.075, 0.100, 0.250, 0.400, 0.500 µg/ml was prepared.

Refer to Figure A4_1(1)-2 for a typical calibration line.

12.3.2 Number of measurements

Each standard was injected once.

12.3.3 Linearity

The detector response (area) for Sumithrin[®] was plotted against the standard concentration. The correlation coefficient was calculated to be 0.9933.

12.4 Specificity: interfering substances

No other substances were found to interfere. The controls were not found to contain any interfering peaks at the retention time of Sumithrin.

12.5 Recovery rates at different levels



Validation at ambient conditions

| Fortification Level (mg/m ³) | Measured Concentration (mg/m ³) | % Recovery | Mean % Recovery | RSD (%) |
|--|---|------------|-----------------|---------|
| Control A | 0.00000 | - | - | - |
| Control B | 0.00000 | - | - | - |
| 0.00120 | 0.00119 | 99 | ■ | 6.8 |
| | 0.00112 | 93 | | |
| | 0.00129 | 108 | | |
| | 0.00109 | 91 | | |
| | 0.00115 | 96 | | |
| 0.0120 | 0.01043 | 87 | ■ | 5.4 |
| | 0.01007 | 84 | | |
| | 0.01042 | 87 | | |
| | 0.01009 | 84 | | |
| | 0.00908 | 76 | | |

Validation at elevated temperature and humidity

| Fortification Level (mg/m ³) | Measured Concentration (mg/m ³) | % Recovery | Mean % Recovery | RSD (%) |
|--|---|------------|-----------------|---------|
| Control A | 0.00000 | - | - | - |

Section A4.2(b) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Air

| | | | | |
|-----------|---------|-----|---|------|
| Control B | 0.00000 | - | - | - |
| 0.00120 | 0.00102 | 85 |  | 10.3 |
| | 0.00113 | 94 | | |
| | 0.00087 | 73 | | |
| | 0.00108 | 90 | | |
| | 0.00114 | 95 | | |
| 0.0120 | 0.01097 | 91 |  | 9.2 |
| | 0.01081 | 90 | | |
| | 0.01024 | 85 | | |
| | 0.01013 | 84 | | |
| | 0.01264 | 105 | | |

12.5.1 Relative standard deviation The Overall RSD = 10.0% for ambient conditions and 9.4% for elevated conditions.

12.6 Limit of determination The limit of determination was established to be 0.001200 mg/m³

12.7 Precision Non-entry field

12.7.1 Repeatability Repeatability was not assessed within this report.

12.7.2 Independent laboratory validation An independent laboratory validation has not been performed.

13 APPLICANT'S SUMMARY AND CONCLUSION

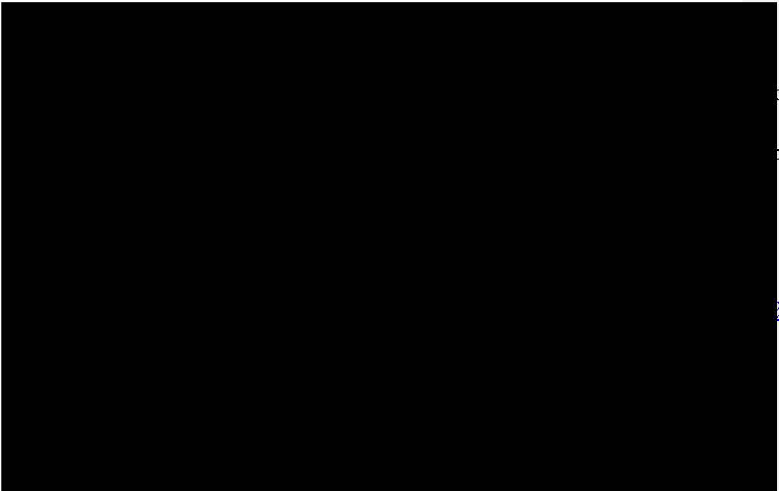
13.1 Materials and methods Control traps (XAD-2 resin packed glass tubes; main front portion of 400 mg, rear 'breakthrough' portion of 200 mg) were fortified with known amounts of d phenothrin, at two levels in quintuplicate. The levels were equivalent to air concentrations of 0.0012 mg/m³ (LOQ) and 0.012 mg/m³ (10x LOQ). The traps were then flushed with air, under ambient or elevated conditions of temperature and humidity, for six hours before being analysed.

d-Phenothrin residues were extracted from XAD-2 resin packed glass tubes (200/400 mg; SKC Cat No. 226-30-06) with toluene. Detection, quantification and confirmation were by gas chromatography with mass spectrometric detection (GC/MS), in the electron impact (EI) mode.

13.2 Conclusion The method is considered to be acceptable in terms of accuracy, precision, linearity and specificity.

13.2.1 Reliability 

13.2.2 Deficiencies 

| Evaluation by Competent Authorities | |
|---|--|
| Use separate "evaluation boxes" to provide transparency as to the comments and views submitted | |
| Date Materials and method Conclusion Reliability Acceptability Remarks |  |
| COMMENTS FROM ... Date <i>Give date of comments submitted</i> Results and discussion <i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i> Conclusion <i>Discuss if deviating from view of rapporteur member state</i> Reliability <i>Discuss if deviating from view of rapporteur member state</i> Acceptability <i>Discuss if deviating from view of rapporteur member state</i> Remarks | |

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Section A4.2(c) Analytical Methods for Detection and Identification
 Annex Point Analytical Method for Drinking Water
 IIA4.1/4.2 & IIIA-IV.1

48 REFERENCE

4.48.1 Reference

4.28.2 Data protection

Yes

4.2.48.2.1 Data owner

Sumitomo Chemical Co., Ltd.

4.2.28.2.2 Companies with a letter of access

Not applicable

4.2.38.2.3 Criteria for data protection

Data submitted to the MS after 13 May 2000 on existing a.s. for the purpose of its entry into Annex I.

59 GUIDELINES AND QUALITY ASSURANCE

5.49.1 Guideline study

European Commission Directive 96/46/EC, July 16, 1996
 European Commission, Guidance Document on residue Analytical Methods, SANCO/825/00 rev. 7, March 17, 2004
 TNsG, Analytical Methods. In Support of the Directive 98/8/EC Concerning the Placing of Biocidal Products on the Market, (Draft Revision Document CA-May08-Doc.6.9)

5.29.2 GLP

Yes

5.39.3 Deviations

None

610 MATERIALS AND METHODS

6.410.1 Preliminary treatment

6.1.410.1.1 Enrichment

Preparation of the SPE

- C18 (500 mg) SPE cartridge was washed with 10 mL toluol
- the cartridge was then washed with 10 mL acetone
- afterwards the cartridge was washed with 10 mL water
- the column must not be allowed to run dry

Preparation of the samples

- 200 mL sample water were transferred into a 250-mL measuring flask
- the fortification samples were spiked as required
- the measuring flasks were filled up to the calibration mark using sample water
- the resulting solution was mixed well by shaking

Extraction

- the sample was completely loaded onto the SPE column and passed through slowly
- finally the column was sucked to dryness by strong vacuum
- 8 mL acetone were used for elution into a 10 mL pyrex glass
- the acetone was evaporated to dryness in a gentle nitrogen stream

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Section A4.2(c) Analytical Methods for Detection and Identification
 Annex Point Analytical Method for Drinking Water
 IIA4.1/4.2 & IIIA-IV.1

- the residue was reconstituted in 1000 µl toluol
- the final solution was transferred into an amber GC vial

6.1.210.1.2 Cle Not applicable
 anup

6.210.2 Detection

6.2.110.2.1 Sep GC/MS:
 aration
 method

| | |
|--------------------------|--|
| GC System | AGILENT 6890 SERIES SYSTEM WITH AGILENT 7683 SERIES AUTOSAMPLER |
| Carrier gas | Helium |
| INJECTION TECHNIQUE | Splitless injection with 2µL injection volume. Injection temperature was 225°C. Purge time was 0.60 min, purge flow was 30.0 mL/min. Gas saver was on. Saver flow was 20.0 mL/min and saver time was 2.00 min. |
| GC capillary column | AGILENT HP 5 MS COLUMN: 15 M LENGTH, 0.25 MM INNER DIAMETER, 0.25 µM FILM THICKNESS. Column flow 1.0 mL/min (constant flow). |
| Oven temperature program | 95°C (0.75 min hold), heat rate 15°C/min to 250°C (hold for 0 min) and heat rate 10°C/min to 275°C (hold for 7 min) |

6.2.210.2.2 Det
 ector

| | | | | |
|------------------|---|-----|------------|------------------|
| MS detection | Agilent 5973 MS operated in electron impact ionisation mode with selected ion monitoring (SIM) | | | |
| | Mass | m/z | Dwell Time | Method |
| | Mass 1 | 123 | 50 | 2nd Confirmatory |
| | Mass 2 | 183 | 50 | Primary |
| | Mass 3 | 350 | 200 | 1st Confirmatory |
| Data Acquisition | Acquisition and peak calculations were performed with Agilent chemstation software. | | | |
| Retention time: | ~ 13.2 MIN FOR SUMITHRIN | | | |
| QUANTIFICATION: | Quantification of the analytical reference item was performed using a Microsoft Excel template using the regression model $y=a*x^b$ | | | |

6.2.310.2.3 Sta
 ndard(s)

A 1000 µg/mL Sumithrin stock solution was prepared by dissolving 13.394 mg of a 96.7% analytical standard in 12.952 mL of toluol and placing in an ultrasonic bath for about 5 min.

Defined volumes of the stock solutions were diluted using acetone to obtain fortification solutions of 10.0, 1.00 and 0.10 µg/mL.

Toluol was used to dilute the stock solution to obtain intermediate and calibration solutions. The range of concentrations of the calibration solutions were 0.005 to 2.00 µg/mL.

Refer to Figure 4.2(c)-1 for a representative chromatogram (primary and confirmatory method) of a 0.005 µg/mL calibration standard and to Figure 4.2(c)-2 for a representative chromatogram (primary and confirmatory method) of a 0.02 µg/mL

Section A4.2(c) **Analytical Methods for Detection and Identification**
Annex Point **Analytical Method for Drinking Water**
IIA4.1/4.2 & IIIA-
IV.1

calibration standard.

6.2.410.2.4 Interfering substance(s) No substances were expected to interfere. Refer to Figure 4.2(c)-3 for a typical chromatogram of an untreated drinking water sample.

6.310.3 Linearity

6.3.410.3.1 Calibration range For quantification the range was 0.02 to 2.0 µg/mL. For qualification, including the detection of residues an extended range of 0.005 to 2.0 µg/mL was used. External calibration was performed based on peak areas.

6.3.210.3.2 Number of measurements Seven calibration standards in the range of 0.02 to 2.0 µg/mL were used for the quantification and 9 calibration standards in the range of 0.005 to 2.0 µg/mL were used for the qualification. Each standard was injected 5 times.

6.3.310.3.3 Linearity The correlation was calculated using a least square fit of a potential function ($y = a \cdot x^b$).
 Data from the calibration generated from the GC/MS analysis used for quantification (primary method (range 0.02 to 2.00 µg/mL)) and qualification (confirmatory method (range 0.005 to 2.0000 µg/mL)) are summarised below:
 Primary method $y = 260801x^{1.3291}$
 $r = 0.9963$
 1st Confirmatory method $y = 14697x^{1.3337}$
 $r = 0.9984$
 2nd Confirmatory method $y = 352689x^{1.2427}$
 $r = 0.9915$

6.410.4 Specificity: interfering substances No interferences above 30% of the LOQ at the retention time of Sumithrin were detected in the untreated control samples.

6.510.5 Recovery rates at different levels The validation summary results of Sumithrin at 0.1 µg/L and 1.0 µg/L in the Primary method are shown below:

| Fortification Level [µg/L] | Mean Recovery [%] | Range [%] | RSD [%] | Number of Analyses |
|----------------------------|-------------------|-----------|---------|--------------------|
| 0.1 | 99 | 78 - 108 | 11 | 5 |
| 1.0 | 87 | 70 - 100 | 15 | 5 |
| overall | 93 | 70 - 108 | 15 | 10 |

The average recovery rates ranged from 87% to 99% with a relative standard deviation of ≤15%.

The validation summary results of Sumithrin at 0.1 µg/L and 1.0 µg/L in the 1st confirmatory method are shown below:

Section A4.2(c) Analytical Methods for Detection and Identification
 Annex Point Analytical Method for Drinking Water
 IIA.4.1/4.2 & IIIA-IV.1

| Fortification Level [µg/L] | Mean Recovery [%] | Range [%] | RSD [%] | Number of Analyses |
|-------------------------------|----------------------|--------------|------------|--------------------|
| 0.1 | 104 | 101 - 109 | 3 | 3 |
| 1.0 | 99 | 96 - 103 | 3 | 3 |
| overall | 102 | 96 - 109 | 4 | 6 |

The average recovery rates ranged from 99% to 104% with a relative standard deviation of ≤4%.

The validation summary results of Sumithrin at 0.1 µg/L and 1.0 µg/L in the 2nd confirmatory method are shown below:

| Fortification Level [µg/L] | Mean Recovery [%] | Range [%] | RSD [%] | Number of Analyses |
|-------------------------------|----------------------|--------------|------------|--------------------|
| 0.1 | 118 | 115 - 120 | 2 | 3 |
| 1.0 | 96 | 92 - 99 | 3 | 3 |
| overall | 107 | 92 - 120 | 10 | 6 |

The average recovery rates ranged from 96% to 118% with a relative standard deviation of ≤10%. Although the mean recovery of the lower fortification level extends with 118% that is outside the required range of 70% - 110%, the result is acceptable because they are used only for confirmation and the deviation is only 8% with the low RSD of 2%.

6.5.10.5.1 Relative standard deviation

Refer to Section 3.5 above.

6.6.10.6 Limit of determination

The validated limit of quantification (LOQ) is defined as the lowest fortification level with mean recoveries ranging from 70% to 110% at a relative standard deviation (RSD) of ≤20%. The LOQ for Sumithrin in drinking water was 0.1 µg/L.

The limit of detection (LOD) was estimated from the lowest detectable calibration standard concentration used (0.005 µg/mL). The corresponding limit of detection for Sumithrin in drinking water was 0.02 µg/L.

6.7.10.7 Precision

6.7.10.7.1 Repeatability

Primary Method (See Table 4.2(c)-2)

For drinking water the relative standard deviations were 11% and 15%. These values are within the limit of 20% of the given guidelines, showing the precision of the analytical method.

Confirmatory Method (See Tables 4.2(c)-3 and 4.2(c)-4)

For drinking water (1st confirmatory method, m/z 350) the relative standard deviations were 3% and 3%. These values are within the limit of ≤20% of the given guidelines, showing the precision of the analytical method.

For drinking water (2nd confirmatory method) the relative standard deviations were 2% and 3%. These values are within the limit of ≤20% of the given guidelines, showing the precision of the analytical method.

| | |
|--|---|
| Section A4.2(c) Annex Point IIA4.1/4.2 & IIIA- IV.1 | Analytical Methods for Detection and Identification Analytical Method for Drinking Water |
|--|---|

| | |
|---|----------------|
| 6.7.210.7.2 Ind ependent laboratory validation | Not applicable |
|---|----------------|

711 APPLICANT'S SUMMARY AND CONCLUSION

| | |
|----------------------------------|---|
| 7.211.1 Materials and methods | The purpose of the study was to develop and validate a residue analytical method for the determination of Sumithrin in drinking water. Local tap water from Itingen, Switzerland was sampled and characterised prior to analysis. |
|----------------------------------|---|

An analytical method for the determination of Sumithrin in drinking water was validated. 5 replicates at 0.1 and 1.0 µg/L and control samples were prepared and analysed by concentrating the sample on a C18 (500 mg) SPE cartridge, eluting using acetone, then evaporating the eluant and reconstituting in 1 ml of toluol. Detection was via GC-MS with SIM.

| | |
|--------------------|---|
| 7.211.2 Conclusion | A method with a limit of quantification of 0.1 µg/L and a limit of detection of 0.02 µg/L in drinking water was validated for the determination of Sumithrin in drinking water. |
|--------------------|---|

The GC/MS method was found to be acceptable in terms of accuracy, precision, specificity and linearity.

| | |
|-----------------------------|---|
| 7.2.211.2.1 Reli ability | ■ |
|-----------------------------|---|

| | |
|------------------------------|---|
| 7.2.211.2.2 Def iciencies | ■ |
|------------------------------|---|

10

Table 4.2(c)-1: Drinking Water Characteristics

| | |
|--------------------------|---|
| Source of Drinking Water | Local Tap Water from Harlan Laboratories, 4452 Itingen, Switzerland. Collected June 04, 2009. |
| Dry Residue | 0.5 g/L |
| Silt Content | 0.3 mg/L |
| pH-Value | 7.83 |
| Dissolved Organic Carbon | 3.320 mg C/L |
| Hardness | 19°dH |

Table 4.2(c)-2: Individual validation results of Sumithrin in Drinking Water (Primary Method)

| | | primary method | | |
|--------------------|-------------------------------|---------------------------------------|-------------|----------|
| Internal Sample ID | Fortification Level [µg/L] | Sumithrin (Quantifier m/z 183) | | |
| | | x [µg/mL] | R [µg/L] | Recovery |
| | | Controls | | |
| 11 | not applicable | < limit of detection | | |
| 23 | not applicable | not detected | | |
| | | Lower Fortification Level: 0.10 µg/L | | |
| 13 | 0.10 | 0.0262 | 0.1048 | 105% |
| 14 | 0.10 | 0.0270 | 0.1079 | 108% |
| 15 | 0.10 | 0.0269 | 0.1078 | 108% |
| 25 | 0.10 | 0.0244 | 0.0976 | 98% |
| 26 | 0.10 | 0.0195 | 0.0779 | 78% |
| | | Average (n=5) | | 99% |
| | | RSD(n=5) | | 11% |
| | | Higher Fortification Level: 1.00 µg/L | | |
| 20 | 1.00 | 0.2468 | 0.9871 | 99% |
| 21 | 1.00 | 0.2330 | 0.9319 | 93% |
| 22 | 1.00 | 0.2507 | 1.0029 | 100% |
| 27 | 1.00 | 0.1745 | 0.6982 | 70% |
| 28 | 1.00 | 0.1782 | 0.7127 | 71% |
| | | Average (n=5) | | 87% |
| | | RSD(n=5) | | 15% |
| | | Overall Average (n=10) | | 93% |
| | | Overall RSD (n=10) | | 15% |

RSD: Relative standard deviation;
n: Number of replicates used for calculation

Table 4.2(c)-3: Individual Validation Results of Sumithrin in Drinking Water (1st Confirmatory Method)

| | | 1 st confirmation method | | |
|--------------------|-------------------------------|---------------------------------------|-------------|----------|
| Internal Sample ID | Fortification Level [µg/L] | Sumithrin (Qualifier m/z 350) | | |
| | | x [µg/mL] | R [µg/L] | Recovery |
| | | Controls | | |
| 11 | not applicable | < limit of detection | | |
| | | Lower Fortification Level: 0.10 µg/L | | |
| 13 | 0.10 | 0.0254 | 0.1014 | 101% |
| 14 | 0.10 | 0.0273 | 0.1091 | 109% |
| 15 | 0.10 | 0.0256 | 0.1025 | 103% |
| | | Average (n=3) | | 104% |
| | | RSD (n=3) | | 3% |
| | | Higher Fortification Level: 1.00 µg/L | | |
| 20 | 1.00 | 0.2446 | 0.9784 | 98% |
| 21 | 1.00 | 0.2406 | 0.9625 | 96% |
| 22 | 1.00 | 0.2569 | 1.0277 | 103% |
| | | Average (n=3) | | 99% |
| | | RSD (n=3) | | 3% |
| | | Overall Average (n=6) | | 102% |
| | | Overall RSD (n=6) | | 4% |

RSD: Relative standard deviation;
n: Number of replicates used for calculation

Table 4.2(c)-4: Individual Validation Results of Sumithrin in Drinking Water (2nd Confirmatory Method)

| | | 2 nd confirmation method | | |
|--------------------|-------------------------------|---------------------------------------|-------------|----------|
| Internal Sample ID | Fortification Level [µg/L] | Sumithrin (Qualifier m/z 123) | | |
| | | x [µg/mL] | R [µg/L] | Recovery |
| | | Controls | | |
| 11 | not applicable | < limit of detection | | |
| | | Lower Fortification Level: 0.10 µg/L | | |
| 13 | 0.10 | 0.0289 | 0.1154 | 115% |
| 14 | 0.10 | 0.0299 | 0.1197 | 120% |
| 15 | 0.10 | 0.0297 | 0.1187 | 119% |
| | | Average (n=3) | | 118% |
| | | RSD(n=3) | | 2% |
| | | Higher Fortification Level: 1.00 µg/L | | |
| 20 | 1.00 | 0.2429 | 0.9717 | 97% |
| 21 | 1.00 | 0.2309 | 0.9236 | 92% |
| 22 | 1.00 | 0.2469 | 0.9878 | 99% |
| | | Average (n=3) | | 96% |
| | | RSD(n=3) | | 3% |
| | | Overall Average (n=6) | | 107% |
| | | Overall RSD (n=6) | | 10% |

RSD: Relative standard deviation;
n: Number of replicates used for calculation

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d-Phenothrin

Product-type 18

JuneAugust 2013

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d-Phenothrin

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Section A4.2(c) Annex Point IIA4.2 IUCLID 6.2/1 Analytical Methods for Detection and Identification Method Validation for the Analysis of Sumithrin in Water

| | | |
|-------------------------------------|--|----------------------|
| | 812 REFERENCE | Official use only |
| 13.3 Reference | | |
| 13.4 Data protection | Yes | |
| 13.4.1 Data owner | Sumitomo Chemical Co., Ltd. | |
| 13.4.2 Criteria for data protection | Data submitted to the MS after 13 May 2000 on existing a.s. for the purpose of its entry into Annex I/IA | |
| | 14 GUIDELINES AND QUALITY ASSURANCE | |
| 14.1 Guideline study | U.S. EPA-FIFRA 40 CFR Section 158.145 | |
| 14.2 GLP | | |
| 14.3 Deviations | | |
| | 15 MATERIALS AND METHODS | |
| 15.1 Preliminary treatment | Non-entry field | |
| 15.1.1 Enrichment | 500 ml aliquots, measured using a graduated cylinder, of control test water were transferred to 1L separatory funnels. The samples were fortified with Sumithrin at concentrations ranging from 0.320 to 104 µg/l. Duplicate samples were prepared for each concentration. Following fortification, approximately 2 g of NaCl were added to each sample and the samples were shaken until the NaCl had completely dissolved. | X6 |
| 15.1.2 Cleanup | Liquid-liquid clean-up was performed as follows:- 100 ml portions of dichloromethane were added to each sample and the samples were shaken for approximately 2 minutes. After the phases were allowed to separate, the dichloromethane phases were eluted over powder funnels containing sodium sulphate (which had been prewashed with dichloromethane) into 500 ml flasks. The extraction was repeated once again and the sodium sulphate was rinsed with an additional 10 ml portion of dichloromethane. The combined dichloromethane extracts were rotoevaporated to near dryness and reconstituted to appropriate volume using a 50% acetonitrile, 50% millipore® water solution. The samples were brought up in volumes such that the concentration of the diluted samples fell within the standard calibration range. During the analysis, it was determined that 2.50 µg/l was the lowest Sumithrin concentration that could be accurately measured using HPLC methods. | |
| 15.2 Detection | Non-entry field | |

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- 15.2.1 Separation method The samples were analyzed for Sumithrin using a Waters Model 510 HPLC pump equipped with a Varian 2050 UV detector and a Shimadzu Sil—6A autosampler. The chromatographic data was collected and stored using a Hewlett Packard 1000 Minicomputer with Beckman CALS System® software. The operating parameters were as follows:
Column: Alltech Econosil C18 (RP), 25 cm x 4.6 mm ID, 10 micron, serial #022588—11.
Mobile Phase:
50% HPLC grade Acetonitrile; 50% Millipore Water
Flow Rate: 1.5 ml/mm
Injection Volume: 200 p1
- 15.2.2 Detector Varian 2050 UV detector; λ 215 nm.
- 15.2.3 Standard(s) A primary stock standard of Sumithrin at a concentration of 1.04 mg/ml in acetone was prepared by dissolving ~0.05g of Sumithrin in 50 ml acetone and stored in a refrigerator. Subsequent dilutions of the 1.04 mg/ml stock solution were prepared in acetone as spiking solutions and in 50% HPLC grade acetonitrile, 50% Millipore water for HPLC chromatography standards.

| Standard Reference (µg/ml) | Volume Taken (ml) | Final Volume (ml) | Concentration (µg/ml) |
|----------------------------|-------------------|-------------------|-----------------------|
| 1040 (Stock) | 1.000 | 50 | 20.8** |
| 20.8 | 0.060 | 100 | 0.012* |
| 20.8 | 0.125 | 100 | 0.026* |
| 20.8 | 0.250 | 100 | 0.050* |
| 20.8 | 0.500 | 100 | 0.104* |
| 20.8 | 1.000 | 100 | 0.208* |

*50% HPLC grade acetonitrile, 50% Millipore water

** Acetone

Calculations

Calculations of the Sumithrin concentrations were performed using the external standard analysis function of a Hewlett Packard 1000 minicomputer using Beckman CALS System® software.

Concentrations of Sumithrin in the samples were determined directly from the standard curve by the following equation:

$(\text{ng/ml Sumithrin equivalents from standard curve equation}) \times (\text{Volume for analysis in ml}) / (\text{sample volume extracted in ml}) = \text{ng/ml Sumithrin (ppb)}$

- 15.2.4 Interfering substance(s) No substances are expected to interfere.

15.3 Linearity

- 15.3.1 Calibration range A calibration curve 0.012, 0.026, 0.050, 0.104, 0.208 µg/ml was prepared.
Refer to Figure A4_1(1)-2 for a typical calibration line.

15.3.2 Number of measurements

Each standard was injected once.

15.3.3 Linearity

The detector response (area) for Sumithrin® was plotted against the standard concentration. The correlation coefficient was calculated to be 0.99955.

15.4 Specificity: interfering substances

No other substances were found to interfere. The controls were not found to contain any interfering peaks at the retention time of Sumithrin.

15.5 Recovery rates at different levels

| Fortification Level (µg/l) | Measured Concentration (µg/l) | % Recovery | Mean % Recovery | RSD (%) |
|----------------------------|-------------------------------|------------|-----------------|---------|
| Control A | <0.250 | - | - | - |
| Control B | <0.250 | - | - | - |
| 0.52 | <0.250 | - | - | - |
| 0.52 | <0.250 | - | - | - |
| 1.04 | 0.438 | 42.1* | - | - |
| 1.04 | 0.398 | 38.3* | - | - |
| 2.5 | 2.04 | 81.6 | 82.7 | 8.1 |
| 2.5 | 1.99 | 79.6 | | |
| 5.2 | 4.61 | 88.7 | | |
| 5.2 | 4.39 | 84.4 | | |
| 52 | 43.4 | 83.5 | | |
| 52 | 49.1 | 94.4 | | |
| 104 | 76.1 | 73.2 | | |
| 104 | 79.5 | 76.4 | | |

* Outside acceptance criteria. Not included in calculation of the mean and %RSD.

15.5.1 Relative standard deviation

The RSD = 8.1%

15.6 Limit of determination

The limit of determination was established to be 2.50 µg/l.

15.7 Precision

Non-entry field

15.7.1 Repeatability

Repeatability was not assessed within this report.

15.7.2 Independent laboratory validation

An independent laboratory validation has not been performed.

X7

16 APPLICANT'S SUMMARY AND CONCLUSION**16.1 Materials and methods**

The method of analysis involves liquid-liquid extraction clean-up of water followed by determination of levels of Sumithrin by HPLC UV detection at 215 nm.

16.2 Conclusion

The method is considered to be acceptable in terms of accuracy, precision, linearity and specificity.

16.2.1 Reliability

16.2.2 Deficiencies

This method does not meet the requirements of the drinking water regulations i.e. the LOD is $>0.1 \mu\text{g/l}$. The method does however cover the range required in the LD₅₀ aquatic toxicology tests and is therefore considered to be fit for purpose.

Evaluation by Competent Authorities

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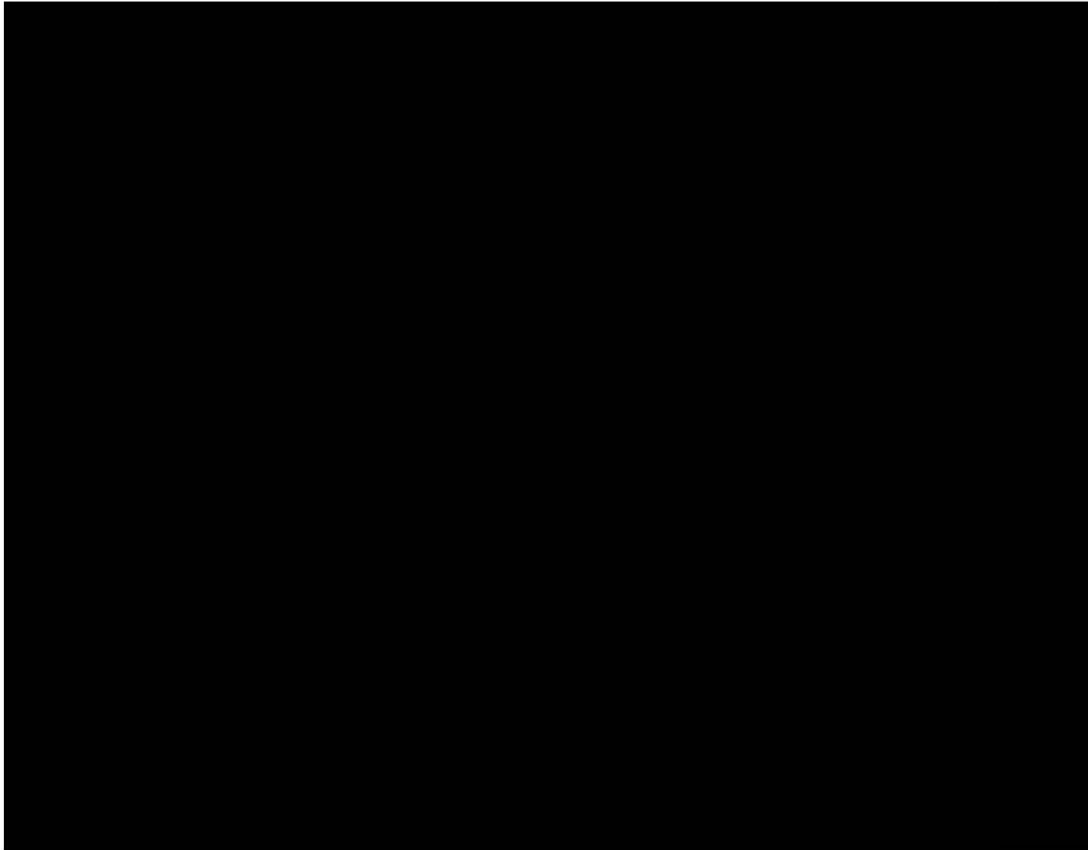
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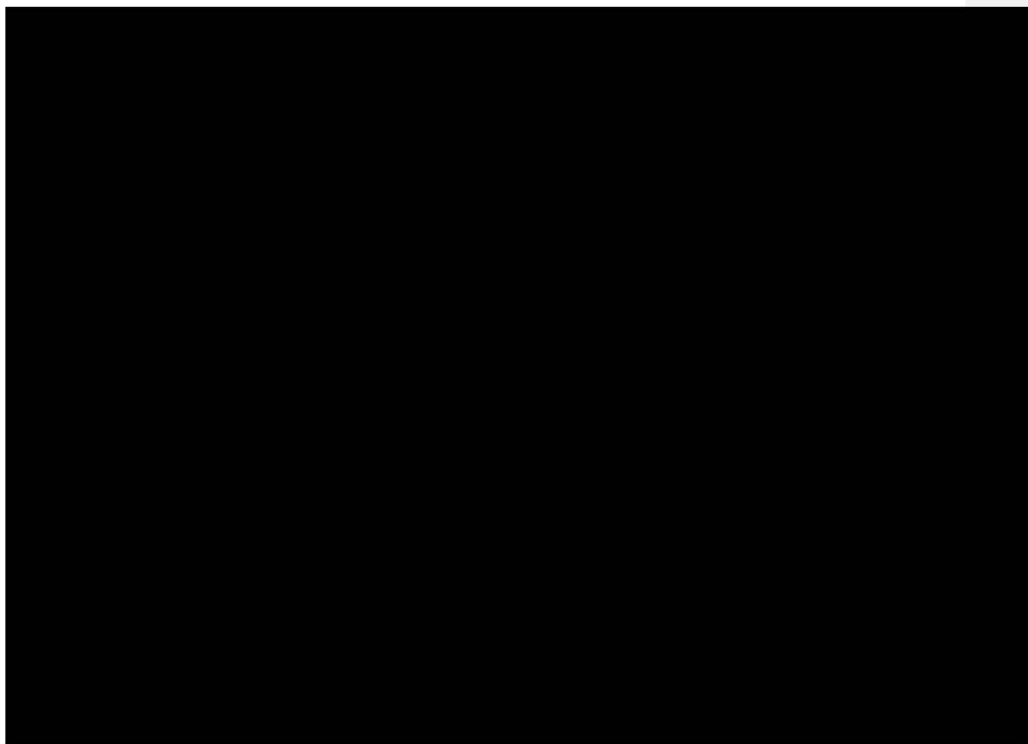
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| | COMMENTS FROM ... |
|------------------------|---|
| Date | <i>Give date of comments submitted</i> |
| Results and discussion | <i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i> |
| Conclusion | <i>Discuss if deviating from view of rapporteur member state</i> |
| Reliability | <i>Discuss if deviating from view of rapporteur member state</i> |
| Acceptability | <i>Discuss if deviating from view of rapporteur member state</i> |
| Remarks | |





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| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| Date | [REDACTED] |
| Evaluation of applicant's justification | [REDACTED] |
| Conclusion | [REDACTED] |
| Remarks | [REDACTED] |

Section A4

Reference list by section number

| Section No./Reference No. | Author(s) | Year | Title, Source (where different from company) Company, Report No. GLP (where relevant) / (Un) Published | Data Protection Claimed (Yes/No) | Owner |
|---------------------------|------------|------|--|----------------------------------|-----------------------------|
| A4_1/01 | [REDACTED] | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |
| A4_1/02 | [REDACTED] | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |
| A4_1/03 | [REDACTED] | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |
| A4_1/04 | [REDACTED] | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |
| A4_1/05 | [REDACTED] | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |

| Section No./Reference No. | Author(s) | Year | Title, Source (where different from company) Company, Report No. GLP (where relevant) / (Un) Published | Data Protection Claimed (Yes/No) | Owner |
|---------------------------|-----------|------|--|----------------------------------|-----------------------------|
| A4_1/6 | CIPAC | 2002 | CIPAC Method 356 - d-Phenothrin Source: CIPAC Report No. none Published: Y | N | CIPAC |
| A4_1/6 | | 2002 | CIPAC Method 356 - d-Phenothrin Small Scale Collaborative Study on the Determination of d-Phenothrin in d-Phenothrin Technical by Gas Chromatography [REDACTED] | N | CIPAC |
| A4_2/b | | 2006 | Sumithrin (d-Phenothrin): Validation of an Analytical Method for the determination of Residues in Air [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |
| A4_2/c | | 2009 | Sumithrin: Validation of a Multi-Residue Method for the Determination of Sumithrin in Drinking Water | Y | [REDACTED] |
| A4_2/d | | 1988 | Method Validation for the Analysis of Sumithrin in Aquatic Test Water [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |

Reference List by Author

| Author(s) | Section No./ Reference No. | Year | Title, Source (where different from company) Company, Report No. GLP (where relevant) / (Un) Published | Data Protection Claimed (Yes/No) | Owner |
|-----------|-------------------------------|------|--|--|--------------------------------|
| CIPAC | A4_1/6 | 2002 | CIPAC Method 356 - d-Phenothrin Source: CIPAC Report No. none | N | CIPAC |
| | A4_2/c | 2009 | Sumithrin: Validation of a Multi-Residue Method for the Determination of Sumithrin in Drinking Water | Y | |
| | A4_1/6 | 2002 | CIPAC Method 356 - d-Phenothrin Small Scale Collaborative Study on the Determination of d-Phenothrin in d-Phenothrin Technical by Gas Chromatography | N | CIPAC |
| | A4_1/05 | 1997 | Enforcement Analytical Method for Sumithrin® Technical Grade. | Y | Sumitomo Chemical Co., Ltd. |
| | A4_2/c | 1988 | Method Validation for the Analysis of Sumithrin in Aquatic Test Water | Y | Sumitomo Chemical Co., Ltd. |

| | | |
|--------------|-----------------|-------------|
| d-Phenothrin | Product-type 18 | August 2013 |
|--------------|-----------------|-------------|

| Author(s) | Section No./ Reference No. | Year | Title, Source (where different from company) Company, Report No. GLP (where relevant) / (Un) Published | Data Protection Claimed (Yes/No) | Owner |
|------------|-------------------------------|------|--|--|--------------------------------|
| [REDACTED] | A4_2/b | 2006 | Sumithrin (d-Phenothrin): Validation of an Analytical Method for the determination of Residues in Air [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | Y | Sumitomo Chemical Co., Ltd. |

**Section A4.1 (1) Analytical Methods for Detection and Identification
Enforcement Analytical Method for Sumithrin® Technical Grade-
Determination of Sumithrin Content**

| 1. REFERENCE | |
|------------------------------------|--|
| 1.1 Reference | |
| 1.2 Data protection | Yes |
| 1.2.1 Data owner | Sumitomo Chemical Co., Ltd. |
| 1.2.2 Criteria for data protection | Data submitted to the MS after 13 May 2000 on existing a.s. for the purpose of its entry into Annex I |
| 2 GUIDELINES AND QUALITY ASSURANCE | |
| 2.1 Guideline study | U.S. EPA Product Properties Test Guidelines OPPTS 830.1800 |
| 2.2 GLP | |
| 2.3 Deviations | |
| 3 MATERIALS AND METHODS | |
| 3.1 Preliminary treatment | Non-entry field |
| 3.1.1 Enrichment | <u>Determination of Sumithrin® Content</u> Weigh accurately about 0.1 g of each Sumithrin® T.G. and Sumithrin® standard, and add exactly 10 mL of the internal standard solution to prepare a sample solution and a standard solution. Perform the test with 1 µL each of the sample and the standard solutions by GC. |
| 3.1.2 Cleanup | No clean-up is required as there are no potentially interfering materials. Standard solutions prepared in solvent are being quantified. |
| 3.2 Detection | Non-entry field |
| 3.2.1 Separation method | Gas Chromatography was used for the determination of Sumithrin®. Column: A glass column (3 mm id. x 1 m), packed with 2 % PEG 20M on Chromosorb W AW DMCS (60 to 80 mesh). Temperatures: Oven, 210 °C Injection port and detector, 240°C. Carrier gas: Nitrogen. Flow rate: Adjust the flow rate so that the retention time of Sumithrin® is about 12 minutes. Refer to Figure A4_1(1)-1 for a typical chromatogram. |
| 3.2.2 Detector | Flame ionisation detection (FID) was employed. |
| 3.2.3 Standard(s) | Approximately 80, 90, 100, 110 and 120 mg of Sumithrin® standard was accurately weighed and dissolved in exactly 10 mL of the internal standard solution (di-(2-ethylhexyl) phthalate) to make calibration solutions (80- 120mg/10 mL). The ratio of peak area of Sumithrin® to |

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Section A4.1 (1) Analytical Methods for Detection and Identification

Enforcement Analytical Method for Sumithrin® Technical Grade-

Determination of Sumithrin Content

that of the internal standard was plotted against the amount of Sumithrin® in the solution to make a calibration curve.

The concentration of Sumithrin® in the Sumithrin® T.G. was determined using the equation below:-

$$C = \frac{W_s \times Q_T \times P}{W_T \times Q_s}$$

where C: the content (%) of Sumithrin® in Sumithrin® T.G.

W_s: the amount (mg) of Sumithrin® standard.

W_T: the amount (mg) of Sumithrin® T.G.

Q_s: the ratio of the peak area of Sumithrin® against that of the internal standard in the standard solution.

Q_T: the ratio of the peak area of Sumithrin® against that of the internal standard in the sample solution.

P: the purity (%) of Sumithrin® standard.

3.2.4 Interfering substance(s)

No substances are expected to interfere as the standard is prepared in analytical reagent grade acetone. The method developed, adequately separates the active substance from its impurities.

3.3 Linearity

NON-ENTRY FIELD

3.3.1 Calibration range

A calibration curve (8, 9, 10, 11 and 12 mg/ml) was prepared containing 10 mg/ml internal standard (di-(2-ethylhexyl) phthalate). Refer to Figure A4_1(1)-2 for a typical calibration line.

3.3.2 Number of measurements

Each standard was injected once.

3.3.3 Linearity

The ratio of Sumithrin® peak area to internal standard was calculated and plotted. The correlation coefficient was calculated to be 1.0000.

3.4 Specificity: interfering substances

No other substances were found to interfere. Refer to Figure A4.1(1)-3

3.5 Recovery rates at different levels

Six separate sub-samples from a sample of Sumithrin® T.G. (10 mg/ml) were analysed and the results were as follows:-

| Percentage Recovery | Mean Recovery (%) | RSD (%) |
|--------------------------------------|-------------------|---------|
| 93.7, 93.9, 92.9 94.1, 93.8, 94.0 | 93.7 | 0.46 |

Different concentration levels were not evaluated, as this is not applicable to purity determinations.

3.5.1 Relative standard deviation

The RSD = 0.5%

3.6 Limit of determination

The limit of determination, based on the lowest calibration standard was 8 mg/ml.

Section A4.1 (1) Analytical Methods for Detection and Identification

Enforcement Analytical Method for Sumithrin® Technical Grade-

Determination of Sumithrin Content

3.7 Precision

Non-entry field

3.7.1 Repeatability

Two different analysts analysed the standards (10 mg/ml) and good precision between the results was found, as shown below:-

X2

| Analyst | % Recovery | Mean Recovery (%) | RSD (%) |
|---------|--------------------------------------|-------------------|---------|
| A | 93.7, 93.9, 92.9 94.1, 93.8, 94.0 | 93.7 | 0.37 |
| B | 93.7, 93.9, 93.6 | 93.7 | |

3.7.2 Independent laboratory validation

An independent laboratory validation is not required for this type of method.

4 APPLICANT'S SUMMARY AND CONCLUSION

4.1 Materials and methods

The method of analysis involves dissolving 0.1g of Sumithrin® T.G. in 10 ml of acetone containing internal standard and quantifying the solution using GC-FID.

4.2 Conclusion

The method is considered to be acceptable in terms of accuracy, precision, linearity and specificity.

X3

4.2.1 Reliability



4.2.2 Deficiencies



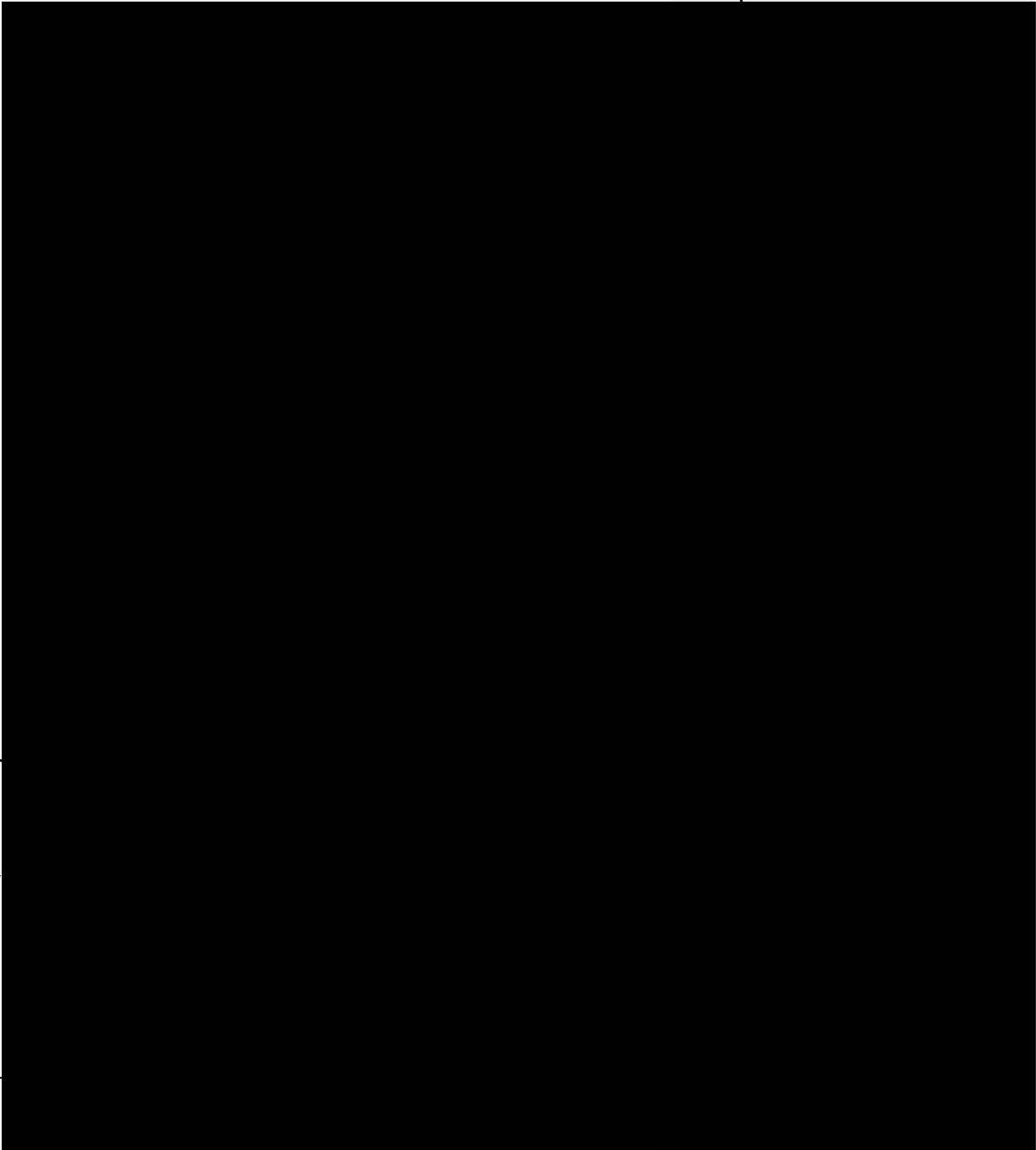
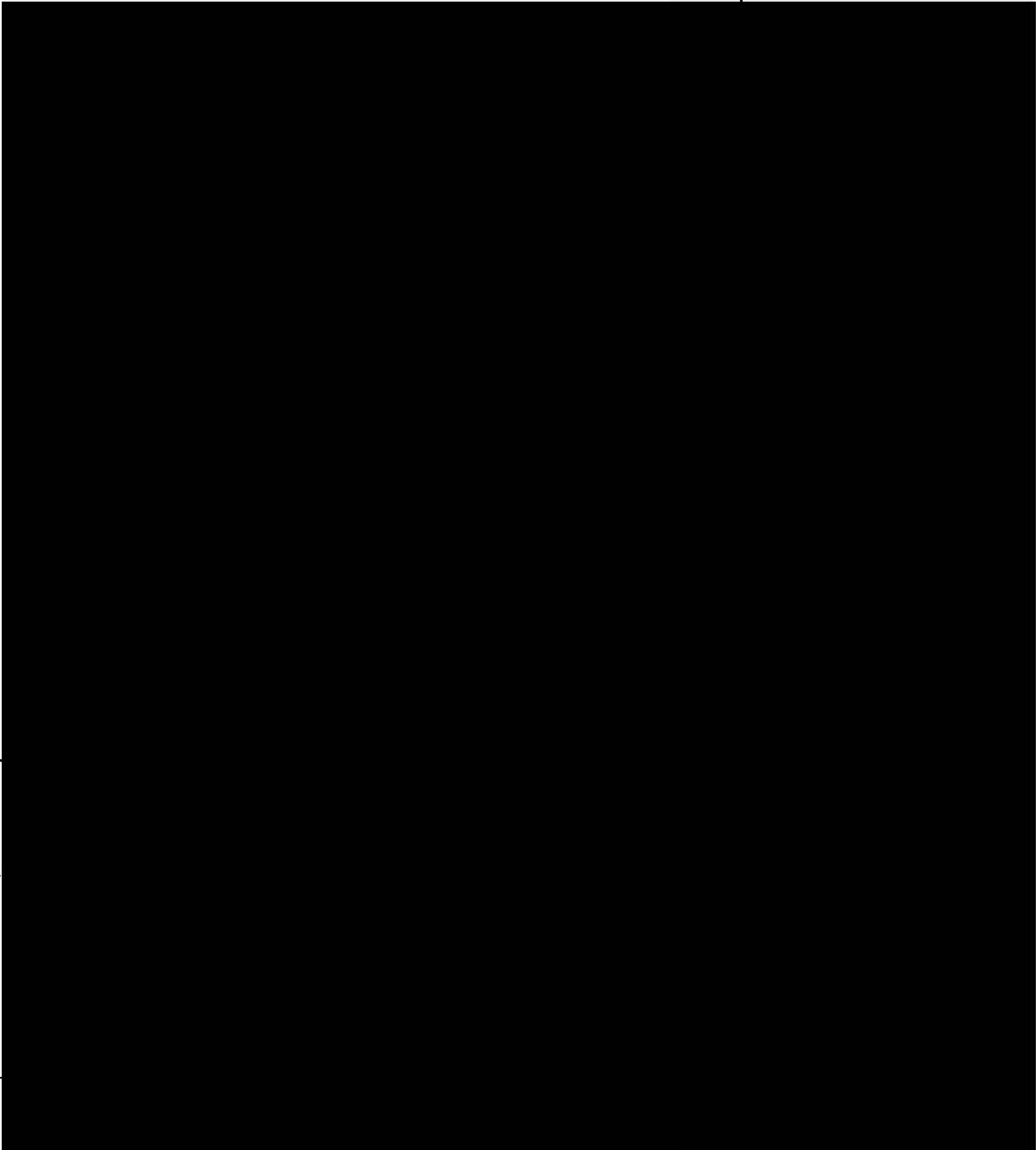
| Evaluation by Competent Authorities | |
|--|---|
| Use separate "evaluation boxes" to provide transparency as to the comments and views submitted | |
| Date Materials and method |  |
| Conclusion Reliability Acceptability Remarks | |
| Date Results and discussion |  |
| Conclusion Reliability Acceptability Remarks | |

Figure A4 1(1)-1 Typical gas chromatogram for the determination of Sumithrin[®] content

Sumitomo Chemical Co., Ltd. Study No. 3256

Page 37 of 45

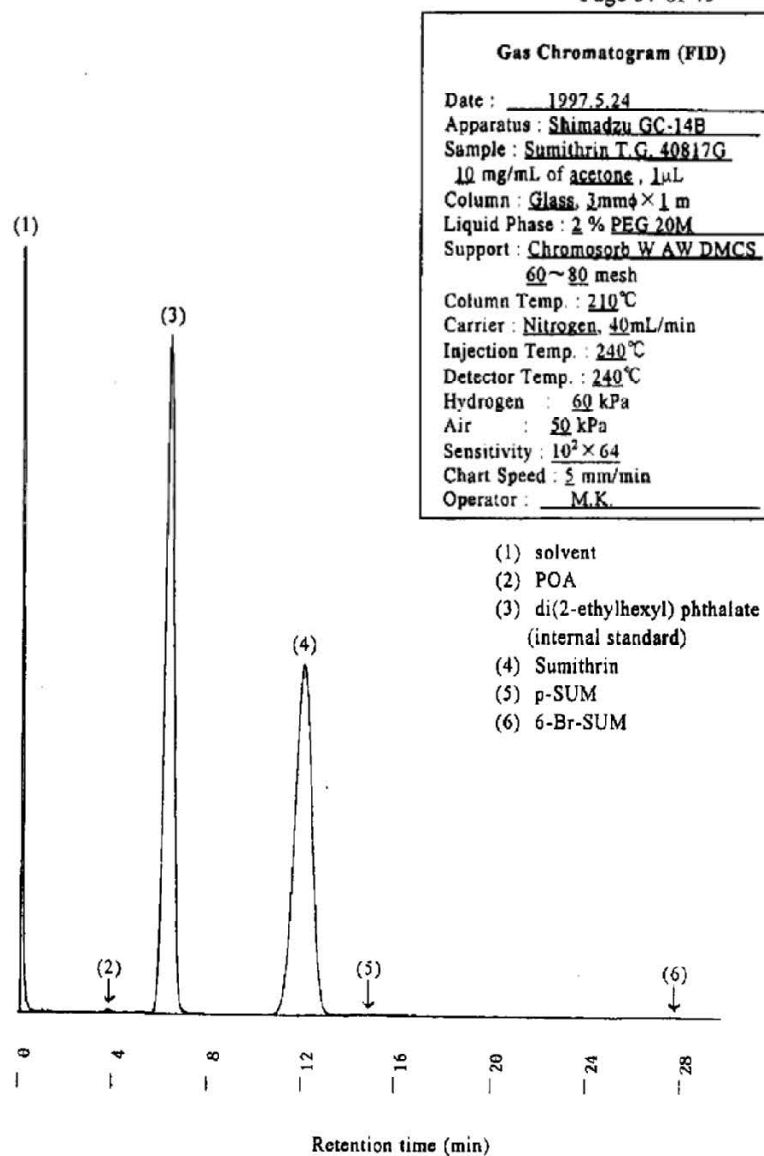


Figure A4 1(1)-2 Calibration curve for the determination of Sumithrin in Sumithrin[®] TG.

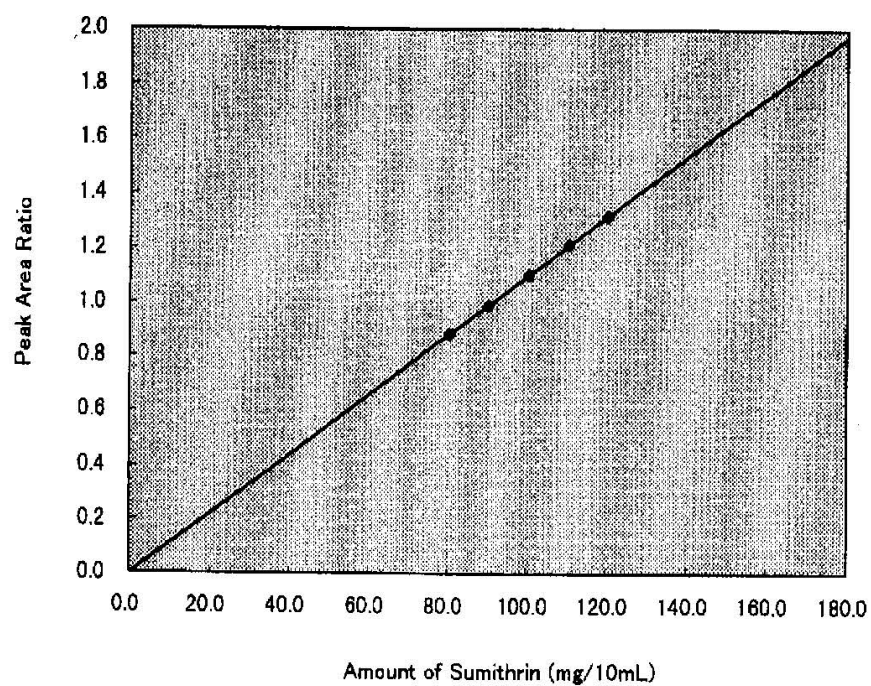
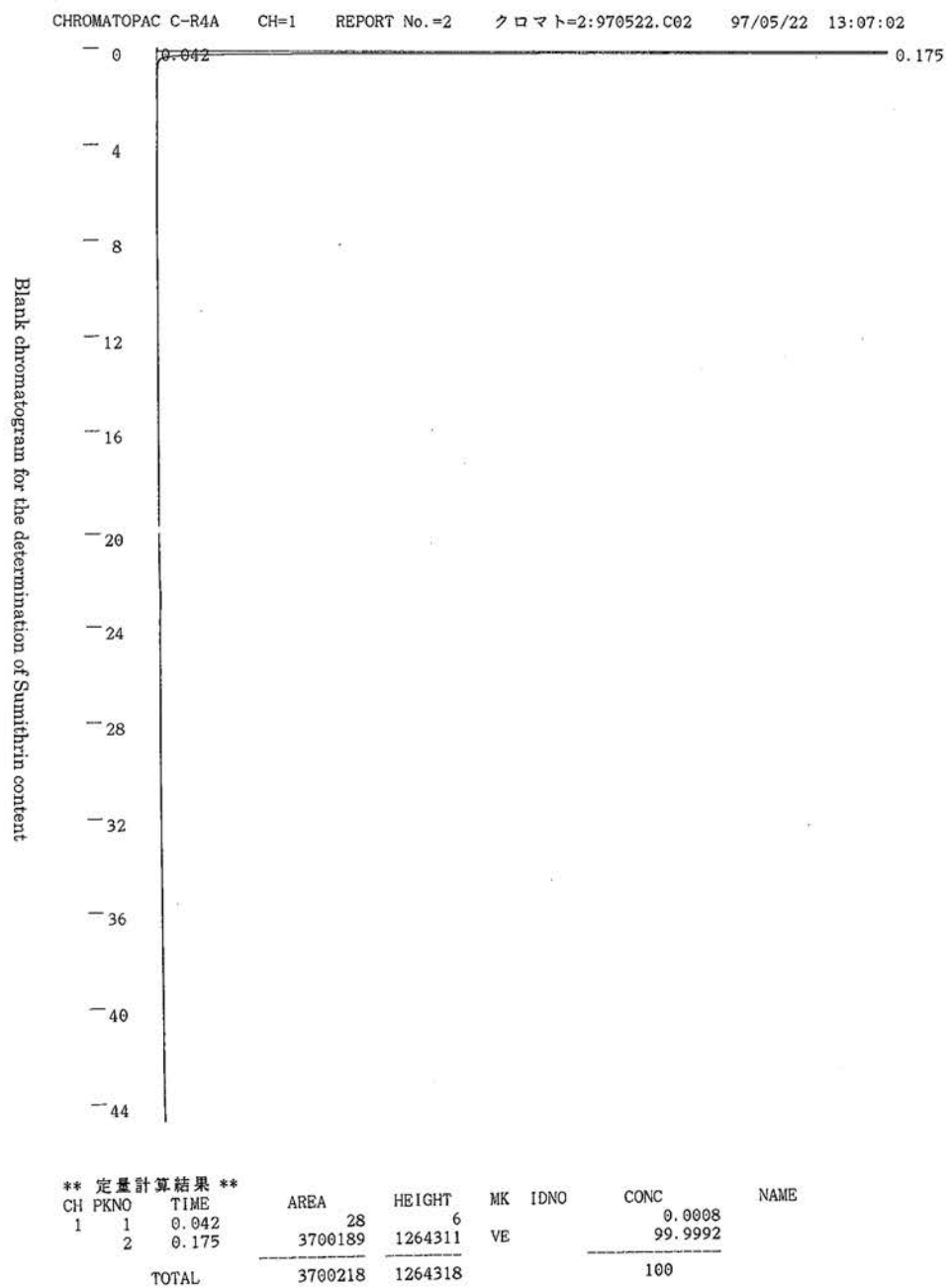


Figure A4 1(1)-3 Typical Blank gas chromatogram for the determination of Sumithrin[®] content

Section A4.1(2) Annex Point IIA4.1 Analytical Methods for Detection and Identification Enforcement Analytical Method for Sumithrin® Technical Grade - Determination of Geometric Isomer Ratios

| | | | |
|------------------------------------|--|---|--|
| | | 5 REFERENCE | |
| 1 REFERENCE | | | |
| 1.1 Data protection | Yes | | |
| 1.1.1 Data owner | Sumitomo Chemical Co., Ltd. | | |
| 1.1.2 | | | |
| 1.1.3 Criteria for data protection | Data submitted to the ms after 13 may 2000 on existing a.s. for the purpose of its entry into annex I | | |
| | | 2 GUIDELINES AND QUALITY ASSURANCE | |
| 2.1 Guideline study | U.S. EPA Product Properties Test Guidelines OPPTS 830.1800 | | |
| 2.2 GLP | | | |
| 2.3 Deviations | | | |
| | | 3 MATERIALS AND METHODS | |
| 3.1 Preliminary treatment | <i>Non-entry field</i> | | |
| 3.1.1 Enrichment | <u>Determination of Geometric Isomer Ratios</u> Dissolve 0.10 g of Sumithrin® T.G. in 10 mL of acetone to prepare a sample solution. Perform the test with 1 µL of the sample solution by GC. | | |
| 3.1.2 Cleanup | No clean-up is required as there are no potentially interfering materials. The samples comprise of standard solutions prepared in solvent. | | |
| 3.2 Detection | <i>Non-entry field</i> | | |
| 3.2.1 Separation method | Gas Chromatography (GC) was used. Column: A glass column (3 mm id. x 2 m) packed with 5 % silicone DC QF-I on Chromosorb W AW DMCS (60 to 80 mesh). Temperatures: Oven, 170°C; Injection port and detector, 220°C. Carrier gas: Nitrogen. Flow rate: Adjust the flow rate so that the retention time of <i>trans</i> -isomer is about 40 minutes. Refer to Figure A4_1(2)-1 for a typical chromatogram. | | |
| 3.2.2 Detector | Flame ionisation detection (FID) was employed. | | |
| 3.2.3 Standard(s) | Approximately 80, 90, 100, 110 and 120 mg of Sumithrin® standard was accurately weighed and dissolved in exactly 10 mL of the internal standard solution (di-(2-ethylhexyl) phthalate) to make calibration solutions (80- 120 mg/10 mL). The ratio of peak area of Sumithrin® to that of the internal standard was plotted against the amount of Sumithrin® in the solution to make a calibration curve. | | |

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Section A4.1(2) Annex Point IIA4.1 Analytical Methods for Detection and Identification Enforcement Analytical Method for Sumithrin® Technical Grade - Determination of Geometric Isomer Ratios

The peak areas of *cis*- and *trans*- isomers in the sample solution were measured and calculated using the following equation:-

$$C = \frac{A_t \times 100}{A_c + A_t}$$

where, C: *trans*-isomer ratio (%).

A_c: peak area of *cis*-isomer,

A_t: peak area of *trans*-isomer.

- 3.2.4 Interfering substance(s) No substances are expected to interfere as the standard is prepared in analytical reagent grade acetone. The method developed, adequately separates the active substance from its impurities.
- 3.3 Linearity Non-entry field
- 3.3.1 Calibration range A calibration curve (8, 9, 10, 11 and 12 mg/ml) was prepared containing 10 mg/ml internal standard (di-(2-ethylhexyl) phthalate).
- 3.3.2 Number of measurements Each standard was injected once.
- 3.3.3 Linearity The ratio of Sumithrin® peak area to internal standard was calculated and plotted. The correlation coefficient was calculated to be 1.0000.
- 3.4 Specificity: interfering substances No other substances were found to interfere. Refer to Figure A4.1(2)-2
- 3.5 Recovery rates at different levels Results for the determination of isomer ratio in the standard mixtures (10 mg/ml)

| Sample No. | Calculated value (%) | | Found value (%) | |
|------------|----------------------|-------------------|-----------------|-------------------|
| | <i>cis</i> -SUM | <i>trans</i> -SUM | <i>cis</i> -SUM | <i>trans</i> -SUM |
| 1 | 30.1 | 69.9 | 29.5 | 70.6 |
| 2 | 25.2 | 74.8 | 24.4 | 75.7 |
| 3 | 20.2 | 79.8 | 19.3 | 80.7 |
| 4 | 0.6 | 99.4 | 1.1 | 98.9 |

Results for the repeatability for the determination of *trans*-isomer ratio

| Found Value (%) | Mean (%) | RSD (%) |
|------------------|----------|---------|
| 80.4, 80.3, 80.2 | 80.3 | 0.1 |
| 80.3, 80.3, 80.2 | | |

Recovery rates for Accuracy and linearity data can be calculated using the accuracy data described in report. Refer to Table 4.1(2)-1

- 3.5.1 Relative standard deviation RSD = 0.1%
- 3.6 Limit of determination The limit of determination, based on the lowest calibration standard was 8 mg/ml.
- 3.7 Precision Non-entry field
- 3.7.1 Repeatability Two different analysts analysed the standards and good precision

Section A4.1(2) Annex Point IIA4.1 Analytical Methods for Detection and Identification Enforcement Analytical Method for Sumithrin® Technical Grade - Determination of Geometric Isomer Ratios

between the results was found, as shown below:-

| Analyst | Found Value (%) | Mean (%) | Overall Mean (%) | RSD (%) |
|---------|--------------------------------------|----------|------------------|---------|
| A | 80.4, 80.3, 80.2 80.3, 80.3, 80.2 | 80.3 | 80.0 | 0.50 |
| B | 79.5, 79.5, 79.5 | 79.5 | | |

3.7.2 Independent laboratory validation

An independent laboratory validation is not required for this type of method.

4 APPLICANT'S SUMMARY AND CONCLUSION

4.1 Materials and methods

The method of analysis involves dissolving 0.1g of Sumithrin® T.G. in 10 ml of acetone containing internal standard and quantifying the *cis* and *trans* isomers using GC-FID.

4.2 Conclusion

The method is considered to be acceptable in terms of accuracy, precision, linearity and specificity.

4.2.1 Reliability



4.2.2 Deficiencies



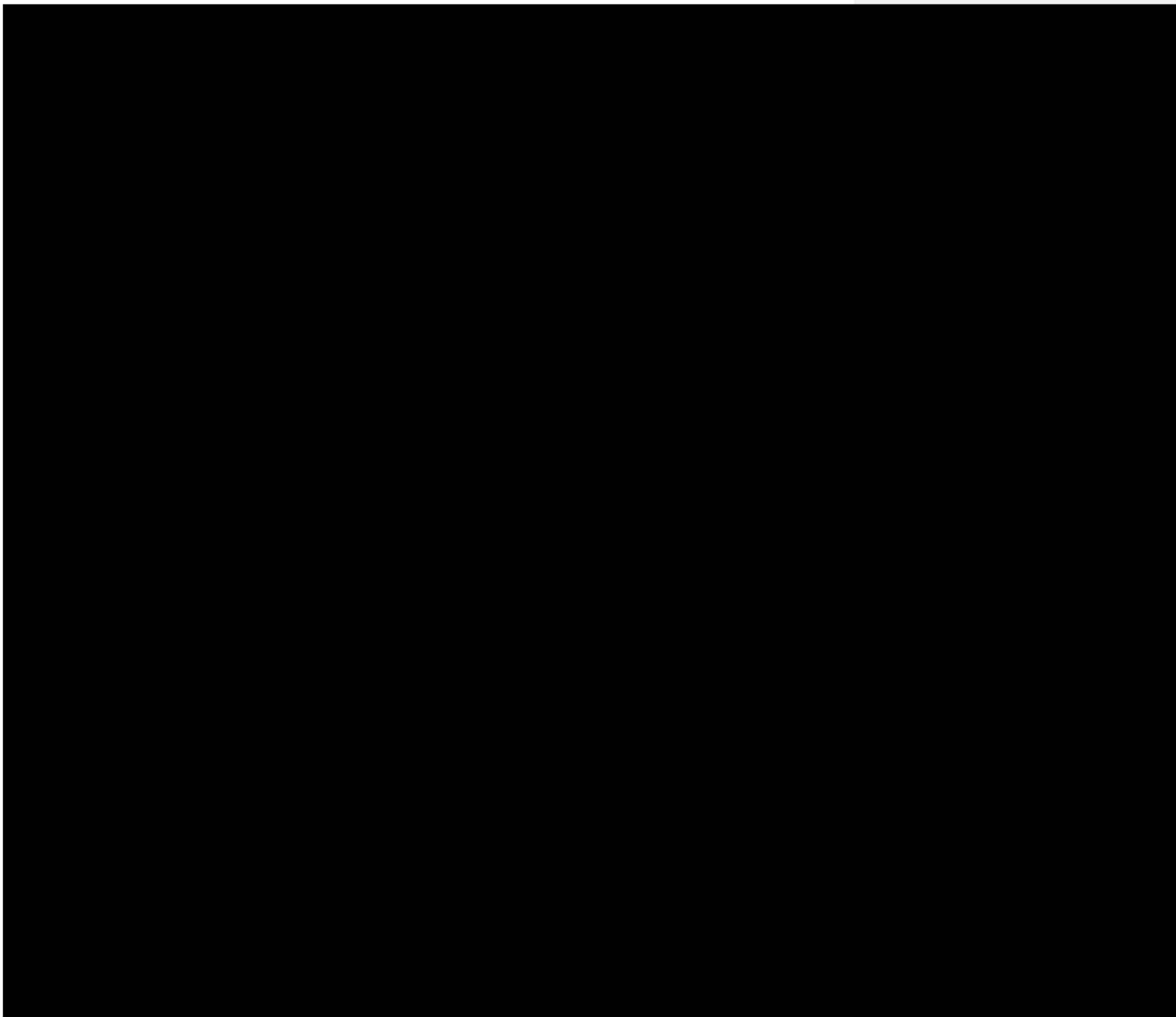


Figure A4_1(2)-1 Typical gas chromatogram for the determination of geometrical isomer ratio of Sumithrin® T.G.

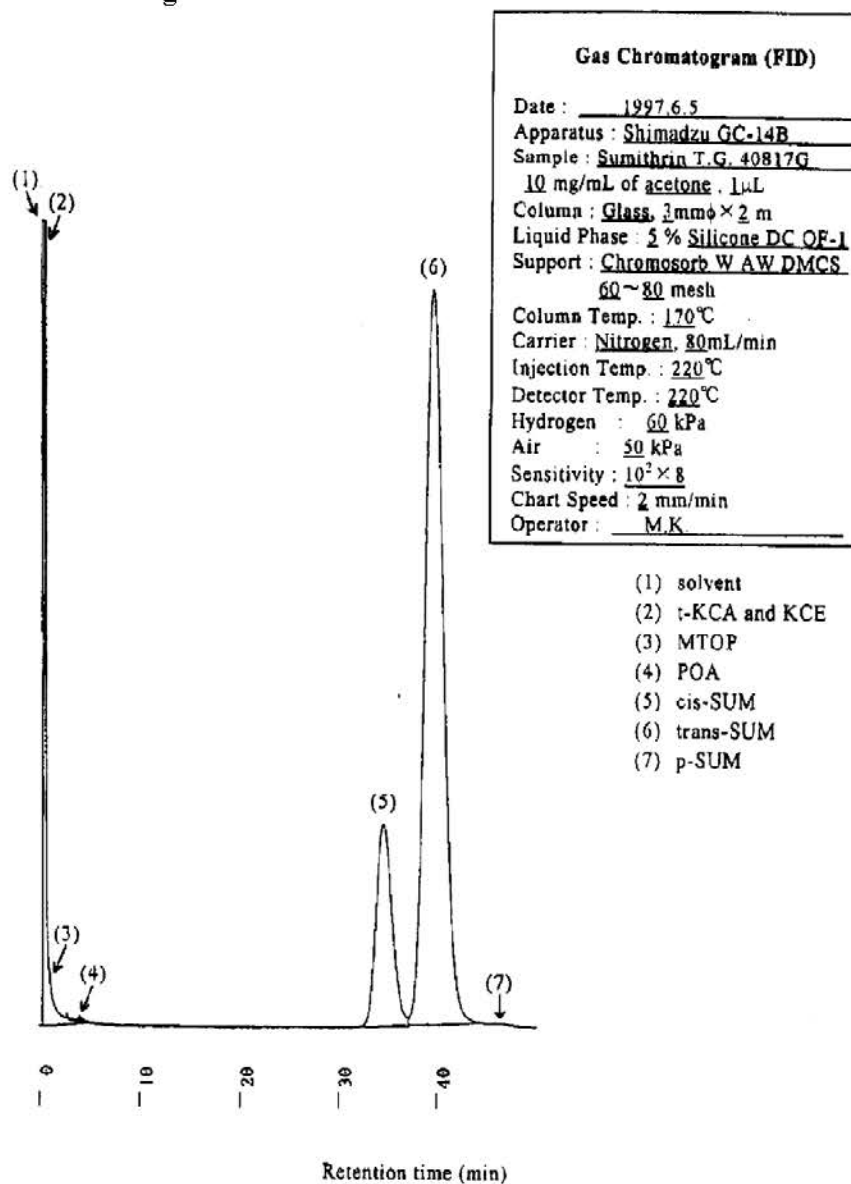


Figure A4 1(2)-2 Typical Blank gas chromatogram for the determination of Sumithrin[®] content