

1. PROJECT TITLE: SPIDOXAMAT: Magnitude of the Residue on PEPPER (GREENHOUSE)

2. JUSTIFICATION AND OBJECTIVES:

IR-4 has received a request for the minor use of spidoxamat on greenhouse-grown pepper for control of aphids, whiteflies, mealybugs, twospotted spider mites, and psyllids, and for the suppression of thrips.

To establish this tolerance, it is required that the magnitude of the residue in or on the commodity be determined as per EPA Series 860 Guidelines. The purpose of this study is to collect and analyze treated and untreated residue samples from appropriate field sites according to the application parameters requested to provide the sponsor with residue chemistry data to support a pesticide tolerance.

3. SPONSOR/TESTING FACILITY NAME, ADDRESS AND PHONE:

IR-4 Project Headquarters, 500 College Road East, Suite 201 W, Princeton, NJ 08540, (732) 932-9575.

4. STUDY DIRECTOR¹:

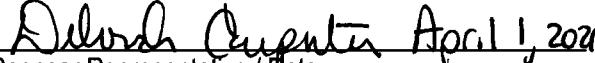
Kenneth Samoil, IR-4 Project Headquarters, 500 College Road East, Suite 201 W, Princeton, NJ 08540, (732) 932-9575 X4614, E-mail: Samoil@njaes.rutgers.edu

5. PROPOSED DATES:

Experimental Start : 03/21
Experimental Termination: 11/22
Study Completion: 10/23

6. STUDY DIRECTOR INITIALS: 

7. STUDY AUTHORIZATION:

 Deborah Carpenter April 1, 2021	 Kenneth Samoil March 31, 2021
Sponsor Representative / Date	Kenneth Samoil / Study Director / Date

8. GOOD LABORATORY PRACTICE COMPLIANCE:

To determine the magnitude of residues of total spidoxamat in or on pepper, this protocol will be employed using appropriate Standard Operating Procedures (SOP's) and will be conducted under provisions outlined in 40 CFR Part 160, in accordance with EPA's Good Laboratory Practice Standards. Canadian field/processing/analytical trials, if any, will be conducted at facilities consistent with the provisions outlined in the Organization for Economic Cooperation and Development (OECD) Series on Principles of Good Laboratory Practice and Compliance Monitoring.

The appropriate cooperative testing facility (field and laboratory) will be responsible for certifying that its portion of the study will be conducted in accordance with EPA's Good Laboratory Practice (GLP) Standards, 40 CFR 160, amended and effective Oct. 16, 1989. A statement of compliance, together with any GLP deviations will be signed and submitted by the appropriate Research Directors in their report or data package.

¹In case the Study Director is not available, contact Dr. Deborah Carpenter at (732) 932-9575 x4637 or Dr. Jerry Baron at (908) 627-4213 for guidance.

9. QUALITY ASSURANCE:

Quality Assurance duties and responsibilities will be in conformance with 40 CFR 160.35. A Quality Assurance Statement will be submitted in the final report and shall include the date inspections were made and date(s) the findings were reported to the Study Director and management.

10. TEST SYSTEM/CROP:

Pepper - Use a commercial variety. Report: variety (**indicate whether it is a small-fruited or large-fruited variety**), source, lot number, date received, and other descriptive information if available.

Field trials will be conducted at the appropriate sites to support the establishment/maintenance of a national residue tolerance; see Section 23 **for these assignments**. See below for assignments of bell or non-bell pepper trials. Refer to Section 11.4 for requirements to differentiate multiple trials by the same field researcher. **If the same Field Research Director has been assigned one bell pepper trial and one non-bell pepper trial, this meets criterion 1C in Section 11.4. It is not required that other means of differentiation listed in Section 11.4 be used (except that independently prepared tank mixes must be used), but using additional means of differentiation is strongly preferred.**

Bell pepper variety:	13084.21-MD184	13084.21-TX316
Non-bell pepper variety:	13084.21-CA63	13084.21-FL137
Either type of pepper variety:	13084.21-WI362	

11. TEST SYSTEM DESIGN and STATISTICAL METHOD:

11.1 Each test site will consist of one untreated and one treated plot.

The individual plots shall be of adequate size to ensure that no more than 50% of the harvestable crop in the sampled area will be needed to provide the necessary plant material. See Parts 17 & 18 for requirements for residue sampling. The sampled crop must be commercially mature to be considered "harvestable", unless otherwise indicated in Part 15 or Part 17.

Field trial 13084.21-CA63 will provide samples for a decline trial (multiple sampling dates for the treated plot). The treated plot(s) must be large enough to provide enough samples on each sampling date to meet sample size requirements.

11.2 Use separate greenhouses or compartments/rooms/barriers within a greenhouse for the treated and untreated plots. Alternatively, the treated plants may be sprayed in a different greenhouse or other enclosed area than the one housing the untreated plants and then moved into the greenhouse with the untreated plants after the spray solution has dried.

11.3 If this pesticide use is not registered on this crop, federal law requires that the treated crop must be destroyed or handled in such a way that it is not consumed as a human food or animal feed.

11.4 This section applies when a Field Research Director (FRD) has been assigned more than one trial in this study, or when two or more trials assigned to different FRDs are located within 18.6 miles (30 km) of each other. An independently prepared tank-mix must be used in each trial. Also, choose at least one option from below:

Option	Description
A	Trial sites must be separated by at least 30 km (18.6 miles) [measured as straight line distance]
B	Planting date (for annual crops) or first application date in each trial is separated by at least 30 days
C	Different crop variety (different size or shape at maturity, rough vs. smooth surface, different amount of foliage shielding the commodity, different rate of growth)—confirm with Study Director if this option will be chosen

If these criteria cannot be met to separate multiple trials, the Field Research Director should contact the Study Director. Trials conducted in different calendar years are exempt from these requirements.

11.5 Mark plots with identifiable markers containing at minimum the Field ID number and treatment number or treatment name that will persist for the duration of the field research trial or that can be readily replaced.

11.6 This study is not designed for statistical evaluation of field data.

12. TEST SITE PREPARATION:

Prepare or select a test site that has been maintained following good local agricultural practices for the production of Pepper (Greenhouse) including fertilization, irrigation, if necessary and available, and other practices that ensure commercially acceptable crop production.

The test site will have a known pesticide and fertilizer history of a minimum of 1 year and preferably 3 years.

13. TEST/CONTROL SUBSTANCE:

IR-4 Headquarters personnel will arrange procurement of GLP test substance from the registrant. The registrant will provide a copy of the Certificate of Analysis to IR-4 Headquarters.

Use the Spidoxamat SG 75 formulation (75% active ingredient) of spidoxamat (EPA Reg No. TBD, CAS# 907187-07-9) that has been characterized to meet GLP standards. This formulation is also labeled as BCS-AA10147 SG 75.

-Upon receipt, document the lot/batch number, condition, quantity received and if GLP characterized. Store the test substance in a secure, clean, dry area and document storage temperatures.

-Temperature monitoring should begin within 2 days of receipt of the test substance, regardless of where it is held or stored.

Contact the Study Director if there are any concerns regarding the GLP status, labeled identification, expiration date, etc. of the test substance.

EPA regulations require that test substance container(s) must be retained until the final study report is completed.

Study completion can be confirmed by contacting the Study Director or the Regional Field Coordinator, or by searching the IR-4 web site; click on "Food Crops" and under the "IR-4 Food Crops Database" click on the "Test Substance Container Disposal Approval" link. URL: <http://ir4app.rutgers.edu/ir4FoodPub/SubstanceDispoSch.aspx>

Alternatively, some registrants will archive the test substance containers. If test substance containers are shipped to another location, the shipment must be conducted in accordance with local, state, and Federal regulations. See shipping documents for directions for return of the test substance; if none are given, contact the registrant representative: Jessica Fernandez, BayerCrop Science LP, phone (919) 549-2631, cell: 919-475-1100; e-mail: Jessica.fernandez@bayer.com

Before the completion of this study, the Study Director shall receive confirmation from the registrant of the location of a retention sample of the test substance. Control substances are not relevant to this study.

An optional tracking form that may be used to confirm that the correct test substance has been received (with the correct label and Certificate of Analysis) is available at: <https://ir4works.org/resources/frd-resources/> .

14. TEST SUBSTANCE APPLICATION:

14.1 Simulate commercial application practices by applying the test substance in a manner representative of an application technique that is used by area commercial growers, at the application rate and timing specified in Section 15.

- Use application equipment that will provide uniform application of the test substance and result in adequate canopy penetration and coverage.
- The test substance, if applied in a mixture, must be applied to the test system within 30 minutes of mixing, otherwise the mixture must be agitated just prior to making the application to ensure that it is well mixed. (The additional agitation should be documented in Part 6G of the Field Data Book.) The mixture must always be applied to the test system within 2 hours of mixing.
- Each field trial requires a unique spray mixture. Do not use the spray mixture from one field trial on another field trial.

For soil applications of any type, see IR-4 Advisory #2004-02 for clarification of terminology:

<http://ir4.rutgers.edu/Other/Advisories/Final2004-02on10Dec04.pdf>

Contact the Study Director if guidance is needed.

All study participants are **reminded** and **encouraged** to follow all appropriate campus, local, state (or provincial) and national regulations and laws in association with the safe use of pesticides.

14.2 Full Calibrations for output and speed must be performed to ensure accurate delivery.

A calibration consists of a minimum of 3 consecutive, documented checks for nozzle or hopper output and speed (equipment or walking speed). An output calibration is a 3 run discharge of all the nozzles. An output recheck is a single run discharge of all the nozzles. A speed calibration is 3 runs. A speed recheck is a single run. (When the output of an airblast sprayer is calibrated or rechecked, it is not necessary to record the outputs of individual nozzles.)

Verification of the actual amount of test substance **applied** will always be made using **the most recent complete calibration data for that equipment**. (Note: When the most recent calibration data is from another trial, a certified true copy of that data must be included in the field data book for this trial.)

Discharge/Output Calibrations:

Is this the first application of test substance in this trial?

YES: A full calibration is required just prior to the first application (allowable the day before the application, but calibration on the day of use is preferred). A single, full calibration may be used for multiple trials in the same study or multiple studies if the following conditions are met:

1. The first application in each trial is the day of the calibration or the following day.
2. Application parameters and equipment components remain the same for each of the trials.
3. A recheck is run in each of the trials after the first.

NO: A single run recheck may be conducted to confirm consistent delivery (within $\pm 5\%$ of the last complete calibration) just prior to subsequent applications. (Full calibrations are preferred.)

Recheck is required when:

1. The equipment has been moved from the location where the most recent full calibration or recheck has occurred. (A sprayer that has been calibrated or rechecked at a farm or research station and then used to make an application somewhere else on that same farm or research station is *not* considered to have been "moved".)
2. The equipment has been cleaned.
3. Nozzles are removed and placed back on.
4. CO₂ tank has been changed.

Recheck is not required when the same Field Research Director is making applications on the same day for multiple trials in this study or separate studies, or multiple treatments in the same trial, unless there have been changes in other application parameters as described above.

Full output calibration is required if:

1. This is the first application in this trial
2. Application parameters or equipment components have changed (other than changing out CO₂ tanks) including:
 - a. Nozzle or hopper output
 - b. Nozzle size or type (full output calibration is not required if the same, clearly identified nozzles used for the full calibration have been placed back in the same positions on the boom after other nozzles have been used for another trial; in this case, only a recheck is needed)
 - c. Change in delivery pressure by more than 5% (even if it has been changed back to the pressure used during the initial calibration UNLESS the pressure change is accomplished by replacing the regulator, and the screw on the regulator used in this trial has not been turned since the full calibration)
3. A recheck is not within $\pm 5\%$ of the last complete calibration.
4. The discharge of any single nozzle during a run of a full calibration or a recheck is greater than $\pm 5\%$ of the mean of the same run (this does not apply to airblast sprayers). If this occurs the nozzle must be adjusted or replaced, and a full calibration must be conducted to ensure that the nozzle discharge is within 5% of the mean and to determine a new output.

Target outputs: The use of a target output rather than the mean output may be used in the calculations made prior to the application; however, a "target check" calibration consisting of three runs must be conducted just prior to each use of a target output, and the mean output must be within 5% of the target output. Using a target output rather than a mean output increases the probability that an application rate deviation will occur. Verification of the amount of test substance that has been applied in calculations that use the discharge rate will always be made using the most recent calibration data.

14.3 Actual Application Rate: Record actual application pass-times in the Field Data Book and verify the accuracy of the application against the protocol rate. **The application is considered acceptable if the accuracy is within -5% and +10% of the target rate specified in Section 15. If the application did not meet this range, the Study Director must be notified of this deviation before proceeding with this trial.**

The submitted Field Data Book shall contain the original calibration data or a true copy of all calibrations referenced, along with the original data from the rechecks performed for this trial.

15. APPLICATION TREATMENTS AND TIMING:

Trt#	Treatment	Target Rate of active ingredient	Target Rate of formulated product*	Application Type	Spray Volume Range**
01	Untreated	Not Applicable	Not Applicable	Not Applicable	Not Applicable
02	SPIDOXAMAT	0.1784 lb ai/acre (200 grams ai/hectare)	108 grams/acre	Chemigation*** or soil drench****	As appropriate for greenhouse irrigation

*The nominal concentration of the formulated test substance will be used in calculating application rates (see Section 13 for the nominal concentration).

**GPA=gallons per acre

***Use low-pressure drip, trickle, micro-sprinkler, or equivalent equipment for chemigation applications.

****If the test substance is applied by soil drench, then irrigate within 4 hours after the application to move the test substance into the root zone.

If it appears that phytotoxicity has resulted from applications made in this trial, contact the Study Director. If possible, take one or more photographs and send them to the Study Director via email to facilitate the evaluation of crop/ test substance effects.

All trials except decline trial 13084.21-CA63: Make 2 applications at intervals of 7(± 1) days with the last application 1 day before harvest.

Decline trial 13084.21-CA63: Make 2 applications at intervals of 7(± 1) days with the last application on the day of the first of multiple harvests.

16. SUPPLEMENTAL CROP TREATMENTS:

Protect the integrity of the field trial by managing pests that may cause significant damage to the test crop. Use only maintenance pesticides that have been registered on this commodity by EPA or the corresponding agency in the country in which the trial is located. Apply according to labeled directions. Make identical applications to the untreated and treated plots. In a field trial with multiple sample collection dates for the treated plot, maintenance applications may be made on that treated plot that are not made on the untreated plot or other plots from which sample collection has been completed.

Consult with Study Director if no registered pesticides are available to control the pests. Document all supplemental crop treatments. DO NOT USE pesticides that are similar to the test substance or other chemicals that might interfere with analysis of the test substance. If unsure, **contact the Study Director**.

17. RESIDUE SAMPLE COLLECTION:

All trials except decline trial 13084.21-CA63: Collect two samples from each plot. Each sample should be representative of the entire plot (except plot ends). At 1 day after the last application, starting with the untreated plot, collect at least 12 fruit from at least 12 plants per sample. If fruit are small (much less than 4 lb per 12 fruit), harvest a minimum of 24 fruit from at least 12 plants per sample. Each bell pepper sample should weigh a minimum of 4 lb (but preferably not more than 6 lb). Each non-bell pepper sample should weigh a minimum of 2 lb (but preferably not more than 6 lb). Each sample should be collected during a separate run through the entire plot.

Take fruit from both sides of row, high and low areas, fruit exposed and sheltered by foliage. Avoid sampling from plot ends. If loose soil or other debris adheres to fruit, remove it by lightly brushing it off (document what is used to remove the soil or debris, e.g. a clean brush, clean gloved hand, clean dry towel, or similar method).

Decline trial 13084.21-CA63 only: Collect two samples from each plot. Each sample should be representative of the entire plot (except plot ends). On the day of the last application, starting with the untreated plot, collect at least 12 fruit from at least 12 plants per sample. If fruit are small (much less than 4 lb per 12 fruit), harvest a minimum of 24 fruit from at least 12 plants per sample. Each bell pepper sample should weigh a minimum of 4 lb (but preferably not more than 6 lb). Each non-bell pepper sample should weigh a minimum of 2 lb (but preferably not more than 6 lb). Each sample should be collected during a separate run through the entire plot.

Take fruit from both sides of row, high and low areas, fruit exposed and sheltered by foliage. Avoid sampling from plot ends. If loose soil or other debris adheres to fruit, remove it by lightly brushing it off (document what is used to remove the soil or debris, e.g. a clean brush, clean gloved hand, clean dry towel, or similar method).

The untreated samples may be collected that day prior to making the last application.

Collect two additional samples from the treated plot at 1, 3, 7(± 1), 14(± 1), and 21(± 1) days after the last application.

All trials: Follow proper handling practices with clean or gloved hands and clean tools to prevent transfer of pesticide residue from one sample to another. If practical, complete harvest and sample preparation for the untreated plot(s) before proceeding to the treated plot(s).

Place all samples in plastic-lined cloth bags. Bags may be obtained from the Field Research Coordinator (Section 23). Identify each sample bag** with correct Field ID number, Test Substance (chemical name listed in Section 15), complete sample ID (see Section 18) and harvest/sampling dates. After residue sample collection, store samples in a freezer. If the samples cannot be placed into a freezer within one hour, use an appropriate method of cooling and temperature-monitoring samples in order to maintain integrity.

When using **IR-4 plastic lined cloth residue sample bags, complete attached sample tag as follows:
Field ID Number; Crop Fraction; Test Substance (enter the chemical name listed in Section 15); Sample ID; Trt#; Harvest Date; Sample Date; Field Research Director (enter name and telephone number).

18. FIELD RESIDUE SAMPLE INVENTORY:

18.1 All Bell Pepper Trials

SAMPLE ID	TRT#	TREATMENT	DAYS AFTER LAST APPLIC.	MINIMUM SAMPLE SIZE	CROP FRACTION
BA	01	Untreated	NA	12 fruits from at least 12 plants / 4 lb.	Fruit
BB	01	Untreated	NA	12 fruits from at least 12 plants / 4 lb.	Fruit
BC	02	SPIDOXAMAT	1	12 fruits from at least 12 plants / 4 lb.	Fruit
BD	02	SPIDOXAMAT	1	12 fruits from at least 12 plants / 4 lb.	Fruit

18.2 All Non-Bell Pepper Trials except Decline Trial 13084.21-CA63:

SAMPLE ID	TRT#	TREATMENT	DAYS AFTER LAST APPLIC.	MINIMUM SAMPLE SIZE	CROP FRACTION
NA	01	Untreated	NA	24 fruits from at least 12 plants / 2 lb.	Fruit
NB	01	Untreated	NA	24 fruits from at least 12 plants / 2 lb.	Fruit
NC	02	SPIDOXAMAT	1	24 fruits from at least 12 plants / 2 lb.	Fruit
ND	02	SPIDOXAMAT	1	24 fruits from at least 12 plants / 2 lb.	Fruit

18.3 Non-Bell Pepper Decline Trial 13084.21-CA63 :

SAMPLE ID*	TRT#	TREATMENT	DAYS AFTER LAST APPLIC.	MINIMUM SAMPLE SIZE	CROP FRACTION
NA	01	Untreated	NA	24 fruits from at least 12 plants / 2 lb.	Fruit
NB	01	Untreated	NA	24 fruits from at least 12 plants / 2 lb.	Fruit
NE	02	SPIDOXAMAT	0	24 fruits from at least 12 plants / 2 lb.	Fruit
NF	02	SPIDOXAMAT	0	24 fruits from at least 12 plants / 2 lb.	Fruit
NC	02	SPIDOXAMAT	1	24 fruits from at least 12 plants / 2 lb.	Fruit
ND	02	SPIDOXAMAT	1	24 fruits from at least 12 plants / 2 lb.	Fruit
NG	02	SPIDOXAMAT	3	24 fruits from at least 12 plants / 2 lb.	Fruit
NH	02	SPIDOXAMAT	3	24 fruits from at least 12 plants / 2 lb.	Fruit
NI	02	SPIDOXAMAT	7 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit
NJ	02	SPIDOXAMAT	7 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit
NK	02	SPIDOXAMAT	14 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit
NL	02	SPIDOXAMAT	14 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit
NM	02	SPIDOXAMAT	21 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit
NN	02	SPIDOXAMAT	21 (± 1)	24 fruits from at least 12 plants / 2 lb.	Fruit

*Sample IDs are out of sequence in order to maintain consistency among trials for Samples NC and ND.

19. RESIDUE SAMPLE HANDLING AND SHIPMENT:

Sample handling and storage methods can be outlined generally in SOP's but describe methods fully in the Field Data Book.

For pre-shipment storage, the samples will be held frozen at temperatures generally less than -18 °C (0 °F), allowing for normal variations of less than 24 hours' duration due to freezer cycling, sample movement, etc. If the analytical laboratory is close enough to the field site to permit delivery of the samples by field personnel on the day of sampling, then pre-shipment frozen storage is not required.

Freezer logs will be used to document all sample additions to and removals from storage. All on-site storage temperatures will be monitored and documented.

For express shipments (overnight carriers such as Federal Express or Airborne), contact the designated person (noted below) from the analytical laboratory prior to sample shipment for any specific shipping instructions. **For shipments via freezer truck (ACDS), it is acceptable to contact the laboratory prior to or on the day of shipment, before or after the samples have been loaded on the truck.** Shipment of frozen samples will be by freezer truck or express shipment, unless the samples are brought to the analytical laboratory by field trial personnel. Shipments sent via express shipment (overnight carriers such as Federal Express or Airborne) will require the addition of quantities of dry ice sufficient to maintain sample integrity while in transit to the laboratory (see IR-4 Advisory 2007-01 for more information). If field trial personnel transport the samples to the analytical laboratory directly from the plots and the sampling-to-freezer interval is more than one hour, an appropriate method of cooling and temperature-monitoring shall be used to maintain sample integrity. If the samples are stored frozen at the field trial facility prior to being transferred to the analytical laboratory by field trial personnel, then appropriate methods must be used to keep the samples frozen during transport. These methods should be documented in the FDB.

Document the notification made to the sample destination by use of e-mail, telephone log, Field Data Book communication note, etc.

Insert a true copy of Field Data Book Part 8B and a blank copy of Field Data Book Part 8C (Sample Arrival Check Sheet) into each box or container used to ship sample bags. This documentation is needed even when field personnel transport the samples to the analytical laboratory.

For analysis, send samples to: Maria Ralat, Food & Env. Tox. Lab, 1642 SW 23rd Drive, Bldg 685, Univ. of FL, Gainesville, FL 32611-0720, (352) 294-3992; e-mail: maralat@ufl.edu

20. FIELD DOCUMENTATION AND RECORD KEEPING:

All operations, data and observations appropriate to this study should be **recorded directly and promptly into the IR-4 Field Data Book.**

The content of the Field Data Book should be **sufficiently detailed to completely reconstruct the field trial.** At a minimum, collect and maintain the following raw data:

- 20.01- Names of all personnel conducting specific research functions
- 20.02- Amendments and deviations from protocol relevant to this trial and standard operating procedures (including copies of signed protocol changes received prior to submission of the Field Data Book to the Regional Field Coordinator).
- 20.03- Test site information
- 20.04- Plot maps
- 20.05- Test substance receipt, use and container/substance disposition records
- 20.06- Test substance storage conditions (including temperatures)
- 20.07- Data regarding calibration and use of application equipment
- 20.08- Treatment application data
- 20.09- Crop maintenance pesticides and cultural practices, test plot history, and composition of growing medium. (The nature of this study is such that growing medium information does not need to be determined under GLP standards.)

- 20.10- Residue sample identification, collection, storage conditions and handling (Weight measurements are considered estimates for the samples collected from field or processing trials, and the scales/balances used for this purpose do not need to be maintained in strict adherence to GLP.)
- 20.11- Residue sample shipping information
- 20.12- Description of crop destruction, or explanation for lack of destruction
- 20.13- Daily Meteorological/Irrigation records (temperature/humidity records for greenhouse trials)--required from the date of planting or transplanting of annual crops or for a minimum of one month prior to the first application onto perennial crops, until last residue sample collection. These records do not need to be determined under GLP standards. If the protocol requires that transplants are treated with the test substance prior to transplanting, then weather records are required from the date of seeding. If transplants are used for an IR-4 trial but no test substance applications are made prior to the transplanting, then temperature/humidity records are NOT required for the period prior to transplanting.
- 20.14- Pass times (if applicable) and other data to confirm amount of material applied to plots
- 20.15- Equipment maintenance records with indication of routine vs. non-routine nature of maintenance
- 20.16- Other applicable data requested in the IR-4 Field Data Book necessary for confirmation that the study was conducted in accordance with the protocol.

Compliance with GLP's is not required for the collection of data associated with crop phytotoxicity.

21. PROTOCOL/SOP MODIFICATIONS - FIELD RESEARCH:

Consult with the Study Director and with the Regional/ARS Field Research Coordinator to discuss desired changes in the protocol prior to occurrence. If appropriate, an amendment will be issued.

Any deviations from the protocol will require the Field Research Director to complete a written report outlining the changes. **Provide this report to the Study Director promptly** (e.g. within 14 days of occurrence or recognition) for review and signature.

All deviations from the approved SOP's also require documentation and **approval by the Study Director**.

22. FIELD RESEARCH REPORT/ARCHIVING:

The Field Research Director will forward the completed originals of the IR-4 Field Data Book and other raw data to the Regional/ARS Field Research Coordinator as soon as possible after the shipment of residue samples.

The Field Research Director will maintain a complete certified true copy of these field documents.

The original IR-4 Field Data Book and other raw data will be forwarded to IR-4 Headquarters for reporting and archiving.

23. FIELD PERSONNEL / ID NO. / REGIONAL/ARS FIELD RESEARCH LOCATION

Field trials will be conducted at the appropriate sites to support the establishment/maintenance of a national residue tolerance. If a Field Research Director is assigned more than one trial in this study, refer to Section 11.4 for requirements to differentiate the trials.

Field Research Director	Field ID NO.	RFC	Test Crop
Megan James, Univ of MD/LESREC, 27664 Nanticoke Rd, Salisbury, MD 21801, (410) 742-8788 x317, Fax#: 410-742-1922; e-mail: mjames14@umd.edu	13084.21-MD184	NER	Pepper (Greenhouse)
Dr Scott Chapman, Department of Entomology 537 Russell Laboratories 1630 Linden Drive University of Wisconsin Madison, WI 53706 608-262-9914; 608-262-3322(FAX) 608-575-6469(MOBIL) scott.chapman@wisc.edu . <u>Shipping Address for ALL Test Substance</u> : Rich Rittmeyer Horticulture Research Farm W 6797 Kampen Rd Arlington, WI 53911-9746 608-635-2026 (Order for Dr Scott Chapman, e-mail scott.chapman@wisc.edu)	13084.21-WI362	NCR	Pepper (Greenhouse)
Michael Long, University of Florida, Plant Science Research & Education Unit, 2556 West Hwy 318, Citra FL 32113-2132; Phone: 352-591-2678 243; fax: 352-591-9860; e-mail: michaeljlong@ufl.edu	13084.21-FL137	SOR	Pepper (Greenhouse)
Miguel Arias, Texas A&M AgriLife Research & Extension Center at Weslaco, 2415 East Highway 83, Weslaco, TX 78596; (956) 969-5655; e-mail: Miguel.Arias@ag.tamu.edu	13084.21-TX316	SOR	Pepper (Greenhouse)
David Ennes, Kearney Agricultural Research & Ext. Center (KARE), 9240 S. Riverbend Ave., Parlier, CA 93648; 559-646-6061, Cell#: 559-791-5309, Fax: 559-646-6015; e-mail: djennes@ucanr.edu	13084.21-CA63 (Decline)	WSR	Pepper (Greenhouse)

RFC = Regional/ARS Field Coordinator

Location:

ARS: Dr Alvin Simmons, USDA-ARS, US Vegetable Laboratory, 2700 Savannah Highway, Charleston, SC 29414; Tel: (843) 402-5307; e-mail: Alvin.simmons@usda.gov

NER: Ms. Marylee Ross, University of Maryland, LESREC, 27664 Nanticoke Rd., Salisbury, MD 21801; Tel: (410) 742-8788 x 310; e-mail: mross@umd.edu

NCR: Dr Anthony VanWoerkom, IR-4 North Central Research Center, Michigan State Univ., 3815 Technology Blvd., Suite 1031B, Lansing, MI 48910-8396, Phones: 517-336-4611(MSU) or 269-561-5040 x107 (TNRC); Cell: 616-403-4706; e-mail: vanwoer3@msu.edu

SOR: Dr Janine Spies, Univ of Florida, 1642 SW 23rd Drive, Bldg 685, PO Box 110720, Gainesville, FL 32611-0720, Ph: 352-294-3991; e-mail: jrazze@ufl.edu

WSR: Dr Michael Horak, Regional Field Coordinator, Western Region IR-4 Project, 4218 Meyer Hall, University of California-Davis, Davis, CA 95616 (530) 752-7634; Cell# 530-219-8466; e-mail: mjhorak@ucdavis.edu

CANADA: Christine Gagnon, (Mailing) Agriculture & Agri-Food Canada, Pest Management Centre, Building 57, CEF, 960 Carling Avenue, Ottawa, ON Canada K1A 0C6, Cell: (343) 550-1047; e-mail: christine.gagnon2@canada.ca. (Shipping): Helen Penny, 108 Helena Street (Back Door), Ottawa, ON, K1Y 3N1; Tel: 613-715-9175; Cell: 613-796-7821; e-mail: Helen.penny@canada.ca

24. LABORATORY PERSONNEL/ID NO.: LAB ID NO.: 13084.21-FLR09

LABORATORY RESEARCH DIRECTOR/TESTING LABORATORY:

Dr Gail Mahnken, Food & Environmental Toxicology, 1642 SW 23rd Drive, Bldg 685, P.O. Box 110720, IFAS, University of Florida, Gainesville, FL 32611-0720, (352) 294-3987; e-mail: gmahnken@ufl.edu

25. LABORATORY SAMPLE INVENTORY:

Treated and untreated samples of pepper will be received from each of the trial sites in Section 23.

Notify appropriate Field Research Director and Regional/ARS Field Research Coordinator of sample receipt.

26. LABORATORY SAMPLE IDENTIFICATION:

Each sample (raw commodity, crop fractions, storage stability, method validation, etc.) is to be assigned a unique laboratory sample number by the laboratory personnel.

A cross-reference must be maintained between the assigned laboratory sample number and the identification utilized in the Residue Sample Shipping and Identification Sheet.

27. LABORATORY SAMPLE STORAGE/PREPARATION:

Store samples in a limited access area at temperatures generally less than -18 °C (0 °F), allowing for normal variations of less than 24 hours' duration due to freezer cycling, sample movement, etc., that will maintain frozen sample integrity, until extraction.

The samples may be stored whole or ground, depending on the standard procedure of the analytical laboratory. However, if maceration will cause residue deterioration, then samples must be stored whole until analysis.

Do not composite samples.

The entire sample provide from the field must be ground, if sample is too large to be manageable then contact the Study Director for appropriate subsampling to assure the representative nature of the sample obtained in the field is maintained by the laboratory procedure.

Generally, sample extracts should be stored at $\leq 4^{\circ}\text{C}$ for no longer than 14 days before analysis.

Storage stability of extracts must be demonstrated if extracts are not analyzed on the same day as they are obtained.

Concurrent fortifications may be used to show extract storage stability, as long as the extracts from the concurrent fortifications have been stored at least as long as the extracts obtained from the weathered samples.

Contact the Study Director if samples extracts are stored greater than 14 days prior to analysis.

All storage temperatures, conditions and location of sample storage are to be monitored and documented.

28. LABORATORY REFERENCE SUBSTANCE:

Obtain the laboratory reference substances listed below from the Registrant. Contact Jessica Fernandez, BayerCrop Science LP, phone (919) 549-2631, cell: 919-475-1100; e-mail: Jessica.fernandez@bayer.com to procure the proper material.

1. Parent compound ID: BCS-AA10147 - 20063
2. BCS-AA10147-cyclohexylketone - ID: BCS-AH92431 - 24937
3. BCS-AA10147-cyclohydroxy (cis) - ID: BCS-CN66620 - 30039
4. BCS-AA10147-cyclohydroxy (trans) - ID: BCS-DH56414 - 29452
5. BCS-AA10147-cyclohydroxy-MA-amide (trans) - ID: BCS-DI13355 - 29807
6. BCS-AA10147-cyclohydroxy-MA-amide (cis) - ID: BCS-DI13356 - 29805

Document the date the analytical standards are received, the source, stated purity, storage conditions, and expiration date.

Use only reference standards that have been characterized to meet GLP standards.

Archival and characterization of the reference substance (purity, identity, stability and solubility) is the responsibility of the registrant.

29. ANALYTICAL METHODOLOGY:

REFERENCE METHOD:

M. Wang. 2020. Analytical Method for the Determination of Residues of BCS-AA10147 and its Metabolites BCS-AH92431, BCS-CN66620, BCS-DH56414, BCS-DI13355, BCS-DI13356, BCS-DH60608 and BCS-DH60611 in/on Plant Matrices Using LC/MS/MS. Bayer Method No. RF-004-P20-01

REFERENCE METHOD MODIFICATIONS/METHOD VALIDATION

The above listed Reference Method(s) may be modified if needed for the test matrix.

The Reference Method, along with any modifications must be validated on each crop fraction prior to residue sample analysis of that crop fraction.

To validate the method, fortify some of the control samples in triplicate with the following analytes at a minimum of 3 concentration levels, lowest level of method validation (0.01 ppm or lower), 0.1 ppm, and 1 ppm.

1. Parent compound ID: BCS-AA10147 - 20063
2. BCS-AA10147-cyclohexylketone - ID: BCS-AH92431 - 24937
3. BCS-AA10147-cyclohydroxy (cis) - ID: BCS-CN66620 - 30039
4. BCS-AA10147-cyclohydroxy (trans) - ID: BCS-DH56414 - 29452
5. BCS-AA10147-cyclohydroxy-MA-amide (trans) - ID: BCS-DI13355 - 29807
6. BCS-AA10147-cyclohydroxy-MA-amide (cis) - ID: BCS-DI13356 - 29805

A minimum of 6 fortification samples (recovery spikes) at the lowest level of method validation (LLMV) is required for each analyte on each fraction prior to completion of the analytical phase of the study. **The acceptable recovery range is 70-120%.**

Documented approval from the Study Director is needed for recoveries outside of this range.
Document the exact procedures for sample analysis.

This validated step-by-step Working Method should incorporate all changes from the Reference Method.

Provide the Study Director with a copy of this Working Method and results of method validation prior to treated sample analysis.

If the Working Method has been used successfully on the test matrix or a similar matrix, the Study Director may waive the requirement for method validation. **Contact the Study Director for details.**

SAMPLE ANALYSIS:

Samples will be analyzed for the total residues of spidoxamat following the Working Method.

Analyte	Reported as
BCS-AA10147	BCS-AA10147
BCS-AA10147-cyclohexylketone (BCS-AH92431)	BCS-AA10147-cyclohexylketone (BCS-AH92431)
BCS-AA10147-cyclohydroxy (cis), (BCS-CN66620)	BCS-AA10147-cyclohydroxy (cis), (BCS-CN66620)
BCS-AA10147-cyclohydroxy (trans), (BCS-DH56414)	BCS-AA10147-cyclohydroxy (trans), (BCS-DH56414)
BCS-AA10147-cyclohydroxy-MA-amide (trans); (BCS-DI13355)	BCS-AA10147-cyclohydroxy-MA-amide (trans); (BCS-DI13355)
BCS-AA10147-cyclohydroxy-MA-amide (cis), (BCS-DI13356)	BCS-AA10147-cyclohydroxy-MA-amide (cis), (BCS-DI13356)
Total Residues of BCS-AA10147 + unconjugated metabolite	Total Residues of BCS-AA10147 + unconjugated metabolite
Total Residues of BCS-AA10147 + unconjugated metabolite + conjugates	Total Residues of BCS-AA10147 + unconjugated metabolite + conjugates

For each field trial associated with this study, analyze at least one untreated and all treated residue samples for each matrix.

Contact the Study Director if residues above the lowest level of method validation for each matrix are detected in the untreated samples.

Any changes or modifications to the Working Method **require Study Director approval**. Whenever possible, **notify the Study Director** prior to occurrence.

Any change or modification to the Working Method must be documented in the raw data and discussed in the final report.

A typical analytical set (or run) should consist of calibration standards, untreated sample(s), concurrent recovery sample(s), and treated sample(s). Each analytical set must begin and end with a calibration standard. Additional calibration standards should be injected with sample analysis to ensure goodness of fit to the standard curve.

Over the course of method validation, residue sample and storage stability (if appropriate) analysis, adequate fortification samples that bracket the actual residues should be analyzed. At least one concurrent fortification sample should be analyzed per analytical set.

The Study Director should be immediately notified if concurrent recoveries deviate from the acceptable recovery range of 70% to 120%.

All efforts will be made to resolve existing recovery problems before continuing forward with additional analytical sets. If residues in samples are above the highest Working Method validation concentration, additional recovery samples at levels above actual residues must be run in triplicate (3 uniquely extracted samples) as soon as practical. A minimum of 6 fortification samples (recovery spikes) at the lowest level of method validation (LLMV) is required for each analyte on each fraction prior to completion of the analytical phase of the study.

Treated samples may be analyzed using a screening run prior to analysis of treated samples using the working method, if the procedure is covered in the laboratory SOPs and the working method for the study. The peak areas of the treated samples and highest standard from any screening run will not be quantified or reported. (Any data, such as chromatograms, generated during screening run(s) will be kept.)

STORAGE STABILITY ANALYSIS:

As soon as possible after receipt of samples, a minimum of six subsamples of all available crop fractions of the control shall be fortified at 0.1 ppm.

Sufficient storage stability data for spidoxamat and metabolites covering the storage of samples for 24 months is in preparation by the registrant. Storage stability analyses of spidoxamat will be run only if sample storage exceeds the aforementioned storage period(s) reported by the registrant.

Contact the Study Director to determine if Storage Stability Samples need to be analyzed.

Only if directed by the Study Director, three samples of each analyte and crop fraction will be analyzed after the appropriate storage period. The analysis of storage stability samples may be conducted following a storage period equal to or greater than 90% of the longest storage period of the field –treated samples from collection in the field/processing facility until their analysis. The remaining samples will be retained for long-term storage.

If analysis of treated/control samples is completed within 24 months of harvest analysis of storage fortification samples may not be required. If appropriate, [contact Study Director](#).

STATISTICAL METHOD(S):

Utilize regression analysis to determine the linearity of the standard curve (r^2) or the goodness of fit if the standard curve is non-linear.

Criteria for acceptance of the standard curve(s) or other statistical methods shall be determined by Laboratory Research Director and documented in the raw data.

30. DISPOSITION OF SAMPLES:

A minimum of 100 g or all (if less than 100 g) of each of the remaining frozen treated and untreated crop samples is to be retained for at least 12 months after submission of the laboratory report.

Long term fortified storage study samples shall be retained for a period of 1 to 5 years, as appropriate, after submission of the final report.

Sample extracts can be disposed of after data analysis.

The Study Director is to be contacted prior to discarding samples.

31. LABORATORY PROTOCOL/SOP MODIFICATIONS - LABORATORY RESEARCH:

Consult with the Study Director regarding desired changes in the protocol prior to occurrence. If appropriate, an amendment will be issued. Any unauthorized changes to the protocol will require the Laboratory Research Director to complete a written report outlining the changes.

This report should be **provided to the Study Director promptly** (e.g. within 14 days of occurrence) for review and signature.

All deviations from the approved SOP's also require documentation and approval by the Study Director.

32. LABORATORY DOCUMENTATION AND RECORD KEEPING:

All operations, data and observations shall be recorded in the analyst's notebook and log books, which must be signed and dated on date of entry.

At a minimum, collect and maintain the following raw data:

- 32.01 - Analytical standard(s) receipt, use and disposition records
- 32.02 - Analytical standard(s) storage conditions
- 32.03 - Analytical standard(s) dilution calculations and preparation records
- 32.04 - Sample storage conditions and locations
- 32.05 - Calculation work sheets
- 32.06 - All chromatograms, including those that are not reported
- 32.07 - Chain of custody records
- 32.08 - Deviations from protocol, Working Method and/or standard operating procedures
- 32.09 - Name of personnel conducting specific research functions
- 32.10 - Sample analysis worksheets
- 32.11 - Storage stability fortification records
- 32.12 - Concurrent recovery fortification records

A study file shall be developed and maintained by the Laboratory Research Director in conjunction with the analysis. It will contain a copy of the protocol, all pertinent raw data, documentation, records, correspondence, and the final analytical summary report. In addition, records of equipment maintenance and calibrations will be kept and periodically archived.

33. LABORATORY RESEARCH REPORT:

The analytical summary report sent to IR-4 HQ shall contain, but not be limited to:

- 33.01 - Applicable method validation data
- 33.02 - Applicable storage stability data
- 33.03 - Residue levels for control samples, treated samples, and concurrent fortified recoveries
- 33.04 - Complete copy of the analytical Working Method

- 33.05 - Any modifications or deviations from the protocol and/or Working Method
- 33.06 - A minimum of 10 representative chromatograms of treated samples (if fewer than 10 submit all), a minimum of three chromatograms each of control and fortified control samples, chromatograms (one of each concentration) for at least one set of calibration standards for each compound analyzed, and any chromatograms of samples with unusual or inconsistent results
- 33.07 - Summary of quantitative data associated with samples and spike recovery samples should be provided (e.g. peak heights, injection volumes, sample sizes, final volumes, etc.)
- 33.08 - Clearly presented example calculations or statistical evaluations
- 33.09 - Discussion of results (including purpose of method modifications, sample storage conditions, etc.)
- 33.10 - Summary data associated with calibration standards (dilution and use records, calibration curves, etc.)

34. LABORATORY ARCHIVES:

For studies assigned to the IR-4 Laboratory at the University of California (CAR), University of Florida (FLR), or Michigan State University (MIR): When the final analytical summary report is completed and sent to the sponsor representative, all original raw data including a "true copy" of the final analytical summary report shall be secured in the archives of the Laboratory Research Director/Testing Facility.

For studies assigned to any other analytical laboratory: When the final analytical summary report is completed the analytical report and all original raw data will be sent to IR-4 Project Headquarters, **1730 Varsity Drive, Suite 210, Venture IV, Raleigh, NC 27606** (when an original document cannot be provided a "true copy" will be provided). All original raw data shall be secured in the archives of IR-4 Headquarters. A "true copy" of the raw data and the final analytical report shall be secured in the archives of the Laboratory Research Director/Testing Facility.

**IR-4
FIELD DATA BOOK**

**TITLE: SPIDOXAMAT MAGNITUDE OF THE
RESIDUE ON PEPPER (GREENHOUSE)**

PR# 13084

SPONSOR

IR-4 Project Headquarters
500 College Road East, Suite 201 W
Princeton, NJ 08540
(732) 932-9575

STUDY DIRECTOR

Kenneth Samoil
Phone extension - 4614
Email – Samoil@njaes.rutgers.edu