

SOP Log Sheet

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FRD/LRD: Sharon Clay
Submitter

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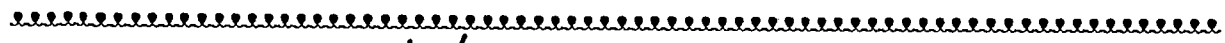
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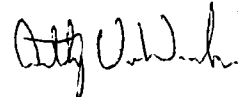
MICHIGAN STATE
UNIVERSITY

TO: Dr. Sharon A. Clay
Plant Science Department
South Dakota State University (SDSU)
Box 2207a
Room 247 Biostress Lab
Brookings, SD 57007

FROM: Anthony VanWoerkom, IR-4 Regional Field Coordinator

SUBJECT: STANDARD OPERATING PROCEDURE (4.2) APPROVAL

DATE: June 16, 2021 (Effective Date)



Per 40CRF160 Good Laboratory Practice Standards (GLP), this is to notify you that your Standard Operating Procedure (SOP) in use is approved. Please retain this document with your SOP to fulfill GLP requirements.

SOP	Rev. #	Last Revision Date	SOP	Rev. #	Last Revision Date	SOP	Rev. #	Last Revision Date
1.1	4.0	3-12-18	6.1	retired	2018	9.3	retired	2014
1.2	4.0	3-12-18	6.2	4.0	3-12-18	9.4	retired	2014
1.3	4.0	3-12-18	6.3	4.0	3-12-18	10.1	4.0	3-12-18
1.4	4.0	3-12-18	6.4	4.0	3-12-18	10.2	retired	2018
2.1	4.0	3-12-18	6.5	4.0	3-12-18	10.3	retired	2018
2.2	4.0	3-12-18	6.6	4.2	5-25-21	11.1	retired	2006
2.3	4.0	3-12-18	6.7	4.0	3-12-18	11.2	retired	2006
3.1	retired	2018	7.1	retired	2014	11.3	retired	2006
3.2	4.2	5-25-21	7.2	4.0	3-12-18	11.4	retired	2006
3.3	retired	2018	7.3	4.0	3-12-18	11.5	retired	2006
3.4	4.0	3-12-18	7.4	4.0	3-12-18	11.6	retired	2006
3.5	retired	2018	7.5	retired	2014	12.1	4.0	3-12-18
4.1	4.1	5-25-21	7.6	4.0	3-12-18	12.2	4.0	3-12-18
4.2	4.1	5-25-21	7.7	retired	2018	13.1	4.0	3-12-18
4.3	4.1	5-25-21	8.1	4.0	3-12-18	13.2	4.0	3-12-18
4.4	4.0	3-12-18	8.2	4.1	6-10-20	14.1	4.0	3-12-18
4.5	retired	2018	8.3	4.0	3-12-18	14.2	4.0	3-12-18
4.6	4.1	6-10-20	8.4	4.0	3-12-18	14.3	4.0	3-12-18
5.1	4.1	5-25-21	8.5	4.1	5-25-21			
5.2	4.0	3-12-18	8.6	4.0	3-12-18			
5.3	4.0	3-12-18	9.1	retired	2014			
5.4	4.0	3-12-18	9.2	retired	2014			



**IR-4 NORTH
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STANDARD OPERATING PROCEDURES
FOR
MAGNITUDE OF THE RESIDUE-FIELD STUDIES

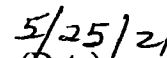
Revision 4.2
May 25, 2021

Weed Stress / Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007

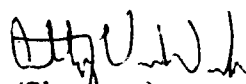
Dr. Sharon A. Clay
SD Field Research Director



(Signature)

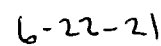

(Initials)


(Date)

Dr. Anthony VanWoerkom
Regional Field Research Coordinator


(Signature)


(Initials)


(Date)

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APPENDIX

- 1 IR-4 Research Protocol
- 2 IR-4 Operational Handbook

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 1.1 General requirements for the development and use of Standard Operating Procedures.

Purpose: To provide guidance to scientists conducting studies in the development and use of Standard Operating Procedures in field research.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Each facility where studies are conducted in the support of the registration of pesticides will develop an SOP for each phase of the research. A Quality Assurance Research Officer (QARO) will periodically inspect and audit the research to determine if the studies are being conducted under the GLP's.
 - 2 The typed name and title of both the Field Research Director and Regional Field Coordinator will appear on the Cover Page. The Field Research Director should sign, initial, and date the Cover Page prior to sending this document to the Regional Field Coordinator. When the Regional Field Coordinator signs, initials, and dates the Cover Page, this becomes the effective date of an entire set of SOP's. This will be done on an annual basis prior to the start of GLP trials.
 - 3 Each individual SOP will be reviewed annually and revised as needed. The revision number of each individual SOP should begin with 2.0 and increase sequentially (i.e. 2.1) with each revision. All earlier revisions will be retained in an Archives file.
 - 4 The ENTIRE SET of SOP's will also be assigned a revision number starting at 2.0. This number will appear on the Cover Page along with the date it that it was submitted to the Regional Field Coordinator. If a revision is made that affects the entire set of SOP's, then the revision number of the entire set will increase by one whole number (3.0, 4.0, etc.). A decimal number (i.e. 2.1) will not be used to name the entire set.
 - 5 Any deviations from the SOPs should be noted in the raw data notebook and approved by the Field Research Director.
 - 6 The SOP's developed for field studies also apply to greenhouse studies unless an SOP has been specifically developed for the greenhouse.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
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Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: March 12, 2018

Title: 1.2 Numbering system for SOPs

Purpose: To provide a general outline for SOP's via a numbering system.

Scope: All SOP's should follow the numbering system to provide uniformity in the system.

Procedures: The numbering system for SOP's is as follows:

1. General
2. Personnel
3. Miscellaneous
4. Calibration of Measuring and Application Equipment
5. Field Preparation and Agronomic Practices
6. Application of Test Substances
7. Data Collection for Current Trials
8. Residue Sample Handling
9. Retired in 2014
10. Archives of Past Trials
11. Retired in 2006
12. Storage, Handling, and Disposal of Pesticides
13. Safety and Health Procedures
14. Procedures to Handle an EPA Audit or Inspection

Weed Stress/Environmental Herbicide Fate Laboratory
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Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

- Title:** 1.3 Format for use in developing SOPs
- Purpose:** To assure an uniform format in the development of SOPs
- Scope:** Applies to all SOPs developed by scientists for use in the conduct of studies under GLPs in Weed Stress/Environmental Herbicide Fate Laboratory.
- Procedures:** The following is the format to be used for each Standard Operating Procedure (SOP):

Name of Laboratory
Address
Field Research Director

Revision Number:

Submitted by:
Revised by:

Submitted Date:
Revision Date:

- Title:** (SOP section number as a decimal and title)
- Purpose:** (Brief description of the purpose of the SOP.)
- Scope:** (Determines where and when the SOP is applicable)
- Procedures:** (Describe the operating procedures in numerical order from beginning to end so that a reasonably intelligent person with some knowledge of the process can carry out the procedures without any verbal input from other sources.)

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: March 12, 2018

- Title:** 1.4 Designation of Field Research Director and responsibilities.
- Purpose:** To provide information on how a Field Research Director is designated and outline the responsibilities of the Field Research Director.
- Scope:** All field personnel involved in the GLP program where a single study is not controlled by a single study director and more than one field and/or laboratory sites are involved.
- Procedures:**
- 1 S.A. Clay (Professor, Plant Science) is appointed as Field Research Director by an institutional authority at the research testing facility to conduct the study. The Field Research Director should be a scientist with appropriate training and experience to conduct the study.
 - 2 The Field Research Director has the responsibility for the following:
 - a Assure that the study is carried out according to an approved protocol (See example in Appendix 1).
 - b Assure that personnel, resources, facilities, equipment, materials and methods are available as scheduled for the conduct of the project.
 - c Make sure that all personnel conducting the study understand the protocol and SOP's for the project.
 - d All deviations reported by the Quality Assurance Research Officer are responded to in writing.
 - e All raw data, summaries and other items connected with the study that need to be retained are stored in archives.
 - f Maintain a master schedule for all GLP projects under his/her direction.
 - g Submit annually a copy of the master schedule to the Quality Assurance Research Officer within 30 days after receiving project assignments.
 - h Designate the location for the Archives if necessary.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: March 12, 2018

Title: 2.1 Personnel

Purpose: To provide information to locations concerning requirements under Good Laboratory Practices for Personnel.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance.

- Procedures:**
- 1 The laboratory will have on file a current summary of the training and experience and a brief description of duties or responsibilities for each person supervising any aspect the study.
 - 2 The Field Research Director will determine that the person or persons conducting the study are of sufficient number to carry out the study to its completion and are sufficiently trained to conduct their portion of the study.
 - 3 The laboratory will have a supply of safety equipment in reasonable working order and sufficiently clean to protect the health and safety of the personnel connected with the project as required by the EPA Worker Protection Standards for Agricultural Pesticides, regulations, other institution regulations, pesticide labels or the study protocol.
 - 4 Where the application of restricted use pesticides is required in the study, the applicator must be certified or under the direct supervision of a certified applicator.
 - 5 Personnel handling pesticides should be trained in accordance with the current policies and guidelines of their institution.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: March 12, 2018

Title: 2.2 Organizational Chart

Purpose: To assist locations in the development of an organizational chart.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance.

- Procedures:**
- 1 An organizational chart should be developed which reflects the management of the facility and the reporting lines of the personnel engaged in the GLP studies.
 - 2 Each block in the chart should show the name and title of the person filling that position.
 - 3 The chart must show how the Field Research Director reports to the Study Director and the National Director, and the relationship between the QAU and the other parts of the organization.

Weed Stress/Environmental Herbicide Fate Laboratory
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Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: March 12, 2018

Title: 2.3 Documentation of Training

Purpose: To assure that training for personnel involved in the study is properly documented.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 A supervisor will oversee every aspect of GLP studies. This supervisor will be either S.A. Clay or another person that she assigns as a substitute.
 - 2 Supervisors will complete a CV to be included in the field data book. At a minimum, this CV will summarize the education; work experience; and special training, qualifications, or accomplishments relevant to the work involved with GLP studies.
 - 3 Supervisors will annually review and understand the standard operating procedures and the sections of the protocol that pertain to their responsibilities. These reviews will be considered training, and will be documented in the personnel files at the location.
 - 4 Training received from workshops, conferences, etc. should be noted as to the name of the event and dates of attendance. A copy of any type of training certificates issued should be retained in the personnel files at the location.
 - 5 A document will be inserted into the field data book that outlines training offered to non-supervisors. This will include the non-supervisor's name, summary of the training received, name of supervisor who provided the training, and the non-supervisor's initials if he/she is to make entries into the field databook.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.2
Submitted by: Graig Reicks

Submitted Date: May 1, 1993
Revised Date: May 25, 2021

Title: 3.2 Guidelines for spray additives in GLP trials

Purpose: To assure that all spray additives are used and stored in a manner consistent with GLP requirements.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay where of spray additives must meet GLP compliance.

- Procedures:**
- 1 Store in a location that has limited access and according to storage requirements on the adjuvant label.
 - 2 If the additive has a suspicious appearance or smell, discontinue its use in GLP trials.
 - 3 Proper labeling will include: name, concentration, required storage conditions (from the label or Safety Data Sheet), and expiration date. If storage requirements and expiration date are not specified, attach a sticker to the container stating "Store Ambient" and add an expiration date up to 60 months from date of receipt.
 - 4 Spray additives can be subdivided into secondary containers for ease of use. These secondary containers must be properly labeled per the original container and now take on all the requirements of an original container.
 - 5 Since adjuvants don't require constant temperature monitoring, the original or secondary container can be brought to the field as long as it's not exposed to excessive heat or cold for extended periods of time. This shouldn't be an issue if the container is stored in an insulated cooler while traveling inside a climate-controlled vehicle. When the vehicle is stopped for an extended time, either roll down the windows or put the cooler containing the adjuvant in a shaded area.
 - 6 Only newly opened syringes may be dipped directly into adjuvant containers. If a measuring error is made with the syringe, the adjuvant can be added back to the container as long as there's no reason to believe that it has been contaminated. Multiple draws with the same syringe are permitted as long as the syringe hasn't come into contact with any potential contamination source. If there's a reason to believe that contamination could have occurred, the spray additive may no longer be used for GLP studies.
 - 7 If dispensing the adjuvant directly into the sprayer tank, keep the syringe a sufficient distance above the spray solution to avoid contaminating the syringe by splashing. If there's reason to believe that a syringe was contaminated, use a new one.
 - 8 With the exception of temperature monitoring (see Procedure 5), SOPs 4.1 and/or 4.2 will be followed when measuring spray additives.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 3.4 Greenhouse/shadehouse facilities

Purpose: To assure that greenhouse and/or shadehouse facilities are properly maintained and in sufficient working order throughout the study to obtain data useful in the registration of pesticides in the GLP program.

Scope: All greenhouse/shadchouse studies performed under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Each greenhouse/shadehouse must be sufficiently large enough to contain the entire study or a complete replicate of the study with sufficient space between plots to reasonably prevent contamination.
 - 2 Where more than one study is conducted in a greenhouse/shadehouse, there must be sufficient isolation between the studies to reasonably prevent contamination or interference between studies.
 - 3 Lighting, temperature, humidity, and shade should be sufficiently uniform at the study sites in the greenhouse/shadehouse to provide nearly uniform plant growth throughout the study sites.
 - 4 The walls, floors, and ceilings of the greenhouse/shadehouse should be maintained in good condition. Floors, benches and isles should be free of debris, weeds and superfluous and well-drained to prevent the buildup of excess moisture.
 - 5 Greenhouses should be equipped so as to maintain temperature, lighting, and moisture conditions to simulate commercial greenhouse production techniques or as required by the study protocol.
 - 6 Sufficient monitoring devices should be installed, in good working order, and calibrated periodically to assure that the proper lighting, temperature and humidity conditions are maintained throughout the study.
 - 7 Document cultural practices used in the greenhouse and treatment locations in the raw data notebook.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.1

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: May 25, 2021

Title: 4.1 Calibration and use of an analytical balance.

Purpose: To assure an accurate dosage in the application of pesticides.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance. Applicable to those studies where a dry material is weighed for use in a field, greenhouse or shadehouse trial.

- Procedures:**
- 1 The balance should be calibrated using certified standard weights immediately prior to weighing the quantity for use in the study by following manufacturer's directions.
 - 2 Do not touch the standard weights with bare hands. Either use clean gloves or some type of clean laboratory wipe.
 - 3 For the scale calibration to be acceptable, the balance must read within +/-1% of the value stated on the standard weight.
 - 4 Recertify standard weights annually by recording the weight of each standard as soon as possible following professional calibration of the balance. Again, this value should read +/- 1% of the value stated on the standard weight.
 - 5 Select a clean container with a tight-fitting lid and tare it on the balance following the manufacturer's directions. Refer to SOP 4.2 for more details on measuring the substance.
 - 6 Weigh the concentrate into tared container on the balance. If taring the container is not practical, then record the weight of the container and add the amount of test substance until the container reaches the correct wt.
 - 7 Dry substances should be measured to at least three significant figures. For example, if trying to measure 5.00 g, the balance should read three decimal places. In this case, a measurement between 4.995 and 5.004 g would be acceptable.

Weed Stress/Environmental Herbicide Fate Laboratory
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Field Research Director: Dr. Sharon Clay

Revision Number: 4.1

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: May 25, 2021

Title: 4.2 Measuring test substances

Purpose: To assure an accurate dosage in the application of a pesticide.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and using liquid formulations of pesticides.

- Procedures:**
- 1 Measuring the test substance at the storage location and then dispensing into a secondary container is preferred. This secondary container is taken to the trial site for application. The temperature exposure range of the secondary container doesn't need to be reported as long as the test substance is applied the day of or the day after removal from the storage location.
 - 2 The original test substance container can be taken to the trial site as long as the temperature exposure range is documented while outside of the storage room. Clearly, this method makes temperature record keeping more complicated.
 - 3 If there's more than one secondary container going to the field at a time, label the secondary containers with their appropriate trial ID numbers. Also include the plot ID if there's more than one treated plot per trial. An exception to this rule is when the secondary containers have the same amount of substance and it came from the same original container.
 - 4 Measuring devices for liquid formulations shall be graduated in increments within 2% of the total volume being measured for that component of the tank mix (i.e. 50 mL is the smallest volume that can be measured with a device having 1 mL increments). If a meniscus forms in the measuring device, take the reading at the bottom of the meniscus.
 - 5 Syringes or pipettes are the preferred measuring devices because they typically don't require rinsing to remove the substance inside of them. A liquid formulation can also be measured with a graduated cylinder. However, these instruments must be triple rinsed to fully-remove the substance inside. Additional rinses maybe necessary if it appears that three rinses didn't remove all of the substance. This rinsate must be dispensed into the sprayer tank for application to the treated plot. Secondary containers must also be rinsed in the same manner to fully-remove the substance inside.
 - 6 Wear appropriate safety equipment while handling pesticide concentrate.
 - 7 Return excess to the original container if the integrity of the substance has not been compromised or dispose of the excess by using appropriate methods.

Weed Stress/Environmental Herbicide Fate Laboratory
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Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.1

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: May 25, 2021

Title: 4.3 Calibration of a Sprayer

Purpose: To determine the delivery rate of a sprayer and make adjustments as necessary to ensure an accurate application of the pesticide.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where a sprayer is used in the application of pesticides.

- Procedures:**
- 1 Visually inspect pumps, hoses, pipes, fittings, regulators, gauges, and tanks for obvious wear or potential leaks and repair or replace as necessary. Use a calibration method suitable to the application and the equipment used such as that accompanying the sprayer manual or a TeeJet catalog. If none is available then proceed with the following:
 - 2 Refer to the protocol for any specified application requirements. Select the appropriate type of nozzle, which is based on the pesticide formulation, the application method, the operating speed, the pressure setting and the dilution rate (gal/acre).
 - 3 All sprayers should have a pressure gauge. Select the proper operating pressure.
 - 4 Place the sprayer on level ground. Adjust the boom height and nozzle spacing for the correct application pattern. Calibrations are often performed without knowing the exact crop height because the trial site is too far away to measure the crop. Therefore, it's acceptable to estimate the crop height when setting the nozzle height for calibration. However, a single recheck at the trial site prior to application should be performed at the correct nozzle height. Determine whether all nozzles are discharging uniformly by spraying water through them at a uniform pressure. Visually evaluate the spray pattern for its complete and symmetrical arrangement. Then catch the discharge from each nozzle in a separate container over a timed interval (usually 20 - 60 seconds, but no less than 15 seconds) beginning after the nozzles are discharging. If the discharge rate of any nozzle varies by more than 5% from the mean within a run, replace all nozzle tips that had a much larger or much smaller discharge. Once all nozzles are within 5% of the mean discharge rate per nozzle for the run, this will be considered the first official run of a calibration. Two more consecutive runs should be performed (total of 3) under the same standard. The three boom discharge rates (sum of all the nozzles on the boom) for a calibration should also be within 5% of the mean boom discharge rate.
 - 5 Determine the nozzle flow rate over the timed interval chosen above. Calculate the average discharge per nozzle in milliliters per second.

EXAMPLE: Sprayer boom had 6 nozzles on 20 inch spacing; boom width is 10 feet.

Calibration	Nozzle 1	Nozzle 2	Nozzle 3	Nozzle 4	Nozzle 5	Nozzle 6	Average
1 30 sec	332	344	345	347	327	351	341.00
2 30 sec	338	339	342	338	320	345	337.00
3 30 sec	333	342	345	342	325	347	339.00
Average	334.33	341.67	344.00	342.33	324.00	347.67	339.00

Average output for 3 calibrations = 339 ml / 30 second or 11.3 ml / second per nozzle.

- 6 Calibrate the speed of the sprayer. This can be performed over the same paths that the applicator will traverse when spraying the plot. Alternatively, a course the same length as the plot about to be treated, over similar terrain, and within a similar crop canopy can be used for speed calibration. One person will operate the sprayer. One person will operate a stop clock. Measure the time it takes to transverse the desired distance in seconds. Calculate the miles per hour using the following equations:

EXAMPLE: The course was 75 feet long and it took 18 seconds to transverse the course.

$$\frac{75 \text{ feet}}{18 \text{ sec}} = \frac{4.17 \text{ feet}}{\text{sec}}$$

$$\frac{4.17 \text{ feet}}{1 \text{ sec}} \times 60 \text{ sec} = \frac{250 \text{ feet}}{60 \text{ sec}}$$

$$1 \text{ mph} = 88 \text{ feet} / 60 \text{ seconds}$$

$$\frac{250 \text{ feet}}{60 \text{ sec}} \times \frac{60 \text{ sec}}{88 \text{ feet}} = 2.84 \text{ mph}$$

The sprayer should be operated over the course for 3 runs. Calculate the average miles per hour from these three runs. The mph from each run should be within 5% of the average mph.

- 7 Delivery rate calibration. This is divided into 3 steps; (1) calculate area covered by boom per second; (2) calculate gallons / sec; (3) calculate gallons / acre.

EXAMPLE:

A. Area covered by boom per second:

$$\frac{4.17 \text{ feet}}{1 \text{ sec}} \times 10 \text{ ft boom width} = \frac{41.67 \text{ feet}^2}{1 \text{ sec}}$$

$$\frac{41.67 \text{ feet}^2}{1 \text{ sec}} \times \frac{1 \text{ Acre}}{43560 \text{ feet}^2} = \frac{0.000957 \text{ Acre}}{\text{sec}}$$

B. Calculate gallons / second

$$\frac{11.3 \text{ ml}}{\text{sec}} \times 6 \text{ nozzles} = \frac{67.8 \text{ ml}}{\text{sec}}$$

$$\frac{67.8 \text{ ml}}{\text{sec}} \times \frac{1 \text{ gallon}}{3785 \text{ ml}} = \frac{0.0179 \text{ gallon}}{\text{sec}}$$

C. Calculate gallons / acre

$$\frac{0.0179 \text{ gallon}}{\text{sec}} \times \frac{1 \text{ sec}}{0.000957 \text{ Acre}} = \frac{18.72 \text{ gallon}}{1 \text{ Acre}}$$

- 8 Volume mixing and dilution calculations. This is divided into 5 steps; (1) calculate plot area in acres; (2) calculate total amount of solution (in milliliters) applied over plot (use gallon / Acre calculated above); (3) determine amount of test chemical to be mixed; (4) determine amount of surfactant (when required); (5) determine amount of water to add to tank mix.

EXAMPLE:

A. Plot area in acres.

$$50 \text{ feet} \times 100 \text{ feet} = 5000 \text{ feet}^2$$

$$5000 \text{ feet}^2 \times \frac{1 \text{ Acre}}{43560 \text{ feet}^2} = 0.115 \text{ Acre}$$

Add a minimum of 10% extra area to fill booms before each pass.

- 20% was used in the example.

$$0.115 \text{ Acre} \times 0.20 = 0.023 \text{ Acre}; \quad 0.115 + 0.023 = 0.138 \text{ Acre}$$

B. Total amount solution applied over plot area.

$$0.138 \text{ A} \times \frac{18.72 \text{ gallon}}{1 \text{ Acre}} \times \frac{3785 \text{ ml}}{1 \text{ gallon}} = 9759 \text{ ml total}$$

C. Amount of test chemical. Protocol calls for 1420 ml product / acre.

$$\frac{1420 \text{ ml}}{\text{acre}} \times 0.138 \text{ A} = 196 \text{ ml product}$$

D. Amount of surfactant. Protocol calls for 0.5 % surfactant v/v.

$$0.005 \times 9759 \text{ ml} = 49 \text{ ml surfactant}$$

E. Amount of water to add to tank mix.

$$\text{Amount of water} = \text{Total volume} - \text{product} - \text{surfactant}$$

$$9514 \text{ ml water} = 9759 \text{ ml} - 196 \text{ ml product} - 49 \text{ ml surfactant}$$

Weed Stress/Environmental Herbicide Fate Laboratory
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Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 4.4 Calibration and use of Granulator Applicators

Purpose: To determine the delivery rate of the granular applicator and make adjustments as necessary to ensure an accurate application of the pesticide

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where a granular applicator is used in the application of pesticides.

- Procedures:**
- 1 Determine that the spreader is in good working order and good mechanical condition. Make sure that the openings to release the granular material are not clogged and free of debris.
 - 2 Refer to manufacturer's manual for the calibration method. If no method is available then proceed as follows:
 - 3 Wear protective clothing as necessary and fill the spreader at least half full of the material to be applied. Attach a pan under the spreader to catch the material as it is released.
 - 4 Measure an area of 0.01 acre or 435.6 square feet in close proximity to the area to be treated. If the applicator width is 10 ft, a simple method to calculate the distance is:

$$\frac{435.6 \text{ ft}^2}{10 \text{ ft}} = 44 \text{ feet to travel}$$

- 5 Determine the approximate setting of the openings and the approximate speed to operate the applicator for the desired amount of active ingredient/acre.
- 6 Operate the applicator over the measured distance and collect the output in the pan attached to the spreader.
- 7 Weigh the material from the pan and multiply by 100 to give the amount applied per acre.
- 8 Continue with steps 5 to 7 until the desired rate is achieved within 5% of the total/acre.
- 9 Example: Formulation= 15% G., rate= 10 lb A.I./acre

$$\frac{10 \text{ lbs A.I.}}{\text{acre}} \times \frac{100 \text{ lbs formulation}}{15 \text{ lbs A.I.}} = \frac{67 \text{ lbs formulation}}{\text{acre}}$$

With the applicator set at the appropriate opening and operated at 4 mph over the 44 ft you get a weighing of 70 lbs. This is within the 5% limit so the applicator is calibrated.

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Submitted Date: May 1, 1993
Revision Date: June 10, 2020

Title: 4.6 Calibration of instruments and gauges.

Purpose: To assure that temperature monitoring devices used for measurement in a GLP study are reasonably accurate and in good working order.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Electronic measuring instruments used in GLP studies should be periodically tested to confirm reasonable accuracy. Calibration against a standard once per year will be acceptable.
 - 2 Thermometers containing mercury or a mercury alternative (i.e. non-electronic) do not require annual calibration.
 - 2 Calibration points will bracket the working ranges of the instrument during the trial. The working range, for example, are the min. and max. temperatures recorded in the chemical storage facility from test substance receipt until the final test substance application.
 - 3 Calibration of the thermometers should be done against standard thermometers. A substance that doesn't freeze in a freezer, such as methanol, is a good medium for testing.
 - 4 Alternatively, thermometers can be compared to freezing water in an ice bath and boiling water. Water (including ice) should be distilled or nanopure.
 - 5 Each calibration point should be within +/-1°C of the standard thermometer. If an ice bath is used, the thermometer being tested should read within -1 to 1°C. For boiling water, the thermometer should read within 99 to 101°C.
 - 6 The standard thermometers will receive an ASTM or NIST calibration at least biannually.
 - 7 A written record should be kept of the dates and results of the tests and of the acceptable tolerance for each instrument.
 - 8 Those instruments that give inconsistent results or are not accurate to within desired tolerances should be repaired or replaced.
 - 9 Refer to the manufactures' manual for the calibration method. If no method is available onsite, then contact the manufacture directly on how to proceed.

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Revision Date: May 25, 2021

Title: 5.1 Site selection and field preparation for field studies

Purpose: To assure plots are large enough to obtain the required data or samples with sufficient uniformity and can be relocated after the study is terminated.

Scope: All locations selected for field studies under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Site selection will be made in accordance with the horticultural practices acceptable for the commodity.
 - 2 Site will be large enough to accommodate the required number of replicates, buffer zones and treatments in accordance with an approved study protocol and for the commodity to be grown under simulated commercial conditions yielding samples of sufficient size for analysis where required.
 - 3 Locate site with sufficient isolation to minimize contamination from external sources such as commercial operations or other research studies.
 - 4 Where samples for residue studies are required, locate a second site within the same area but with enough isolation to produce untreated, uncontaminated samples.
 - 5 If the commodity is not to be newly established, select a site that has a uniform stand for production.
 - 6 Cultural practices (plowing, planting, etc.) should be performed prior to plot layout and marking.
 - 7 Prepare a plot map showing the location of each plot on the site and the North azimuth. The plot map should contain permanent reference points so that the plots can be relocated after the study is terminated.
 - 8 A Global Positioning System (GPS) may be used to determine reference points. If the trial protocol does not specify a minimum number of GPS points to record, then a minimum of 2 opposite corners per plot in the trial shall suffice. GPS accuracy will be checked against a known latitude and longitude reference point before and after taking readings of the GLP trials each year. Three readings will be taken for each GPS accuracy check, with the GPS unit being fully shut-down and restarted for each reading. Even though submeter accuracy is possible with our GPS receivers, it can be very time-consuming waiting for the proper satellite conditions. Therefore, 2m accuracy is an acceptable balance between quality and efficiency.

- 9 Each plot will be identified as detailed in the study protocol. If statistical analysis is to be performed on the data, assign the replicates and treatments to the plot map using a commonly accepted statistical design with sufficient information to identify the replicate and treatment assigned to each plot.
- 10 Lay out each plot on the site using a suitable measuring device to accurately locate the plots on the site.
- 11 Identify both ends of each plot with a marker of sufficient visibility to be seen easily throughout the duration of the study.
- 12 Number each marker with a permanent number corresponding to the plot number on the plot map.
- 13 The plot map (item 7) and a summary of the cultural practices (item 6) should be part of the raw data notebook.
- 14 Refer to a reasonably up-to-date publication on the production of the commodity under study. If no such publication exists, consult with an agricultural specialist familiar with the production practices for the commodity.
- 15 Determine pH and soil fertility requirements of the commodity. Obtain random samples of soil for testing from the study site. Have the soil tested to determine how well it will meet the requirements of the commodity (specify whether or not the testing was done under GLP in the raw data book).
- 16 Lime, fertilize and/or condition the soil at the site as necessary to bring the soil reasonably within the requirements of the commodity.
- 17 Till the field as specified for the commodity.
- 18 Apply appropriate pesticides (preplant herbicide, soil insecticide, fungicide drench, soil-incorporated nematicide etc.). Apply and document application of pesticides as specified in other areas of these SOP's.

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Title: 5.2 Method for seeding or transplanting

Purpose: Assure that commodities are grown under good agricultural practices and provide a uniform crop for study.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where the seeding or transplanting is prepared.

- Procedures:**
- 1 Determine the correct species and variety to use as specified by the study protocol. If the variety is not specified, determine the variety most commonly used in the area by commercial producers and use it for the study. If a commercial producer is providing the plants, try to select plants as uniform in growth and color as possible.
 - 2 Plant seeds at the proper population, row spacing, and depth as specified from SOP 5.1. Plant the seed or transplant in reasonably straight lines or rows with fairly accurate measurements to assure the commodity is planted according to specifications.
 - 3 Irrigate or perform other agricultural practices as necessary to get the commodity started.

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Revision Date: March 12, 2018

Title: 5.3 Commodity maintenance

Purpose: Assure that commodities are grown under good agricultural practices and provide a uniform crop for study.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

Procedures:

- 1 If pesticides, fertilizers, or any other substances are applied for crop maintenance, they should be applied uniformly to all plots in a trial.
- 2 Contact the Study Director to determine whether maintenance pesticides could interfere with analyzing test substance residues.

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Revision Date: March 12, 2018

Title: 5.4 Determining yield or quality

Purpose: To assure that a measurement of yield or quality of the various treatments is taken if required to evaluate the effects of the treatments.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance and requiring yield data. (Sample handling for residues is covered under another SOP).

- Procedures:**
- 1 Where possible, obtain a reasonably up-to-date copy of the United States standards for grades of the commodity under study from the Agricultural Marketing Service or other sources. If U.S. grade standards do not exist, then consult other sources and document the plant stage, fruit ripeness, or other characteristics needed to determine quality in the raw data notebook.
 - 2 Check the protocol for information on time of harvest. If none, then follow commercial practices in the area for the appropriate time to harvest the commodity.
 - 3 Where grading standards are known or exist, the commodity should be graded accordingly at harvest to segregate the harvest to measure quality.
 - 4 If specified by protocol, each portion of the commodity, divided as to its quality standard, should be weighed or measured to determine yield. Written records should be kept of each measurement for each plot.
 - 5 The commodity will be harvested according to the method designated in the protocol.

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Title: 6.2 Adding the pesticide concentrate to the water carrier in the spray tank of a sprayer.

Purpose: To obtain the proper dilution and mixing of the concentrate in the spray tank.

Scope: All field studies conducted under the direction of S. A. Clay and requiring GLP compliance and where a sprayer is used.

- Procedures:**
- 1 After the sprayer has been inspected and calibrated, empty the water from the tank. Open the sprayer lid.
 - 2 Add about half of the water to the spray tank.
 - 3 If needed (i.e. wettable powder formulation) make a slurry mix first by adding the concentrate to a small volume of water in a separate, reasonably clean container. Add the pesticide concentrate or slurry and adjuvants (if needed) to the water in the spray tank. Triple rinse the container holding the pesticide concentrate (and slurry) using the remaining water not in the spray tank and add the wash water to the spray tank.
 - 4 Add the remaining water to the spray tank. Close and tighten the lid.
 - 5 Thoroughly shaking the sprayer tank by hand just prior to application coupled with the natural splashing inside the sprayer tank during the application usually provides sufficient agitation. Sometimes a protocol and/or pesticide label will recommend constant agitation during the application. If this is a requirement, a spraying system capable of constant agitation will be used.
 - 6 All personnel involved in storage, mixing, application, and cleanup of pesticides will be properly trained.

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Revision Date: March 12, 2018

Title: 6.3 Procedures for the application of the test substance in the field.

Purpose: To assure that the test substance is applied uniformly to the plots.

Scope: All field studies conducted under the direction of S. A. Clay and requiring GLP compliance and where the test substances are applied.

- Procedures:**
- 1 Application equipment should be inspected and calibrated according to guidelines outlined in Section 4.
 - 2 Make sure all settings of pressure, speed, granular flow etc. are set according to specification from the calibration as previously performed.
 - 3 Where possible, apply the material beginning with the lowest concentration and work up to the highest concentration.
 - 4 Just before entering each plot make sure you are traveling at the correct speed and turn on the sprayer or release the granules. Maintain the correct speed through the plot.
 - 5 Turn off the sprayer or stop granular flow just after leaving the plot.
 - 6 Record pass times in the Field Data Book.
 - 7 Appropriate weather conditions for the application of the pesticide should prevail otherwise the pesticide applications should be delayed.
 - 8 All precautions should be taken to avoid applying pesticides to or near sensitive areas or where drift to these areas may occur.
 - 9 All pesticides should be mixed in quantities which are adequate for the job to avoid excess dilute solutions after the job is completed. Cleanup procedures should be established whereby excess sprays can be safely discarded preferably by spraying the material on an overplanting of the commodity.

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Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

- Title:** 6.4 Application of pesticides in the greenhouse.
- Purpose:** To assure that the study pesticide(s) are applied uniformly and at the correct dosage.
- Scope:** All greenhouse studies conducted under the direction of S. A. Clay and requiring GLP compliance and where pesticides are applied.
- Procedures:**
- 1 Application equipment should be inspected and calibrated according to guidelines outlined in Section 4.
 - 2 Make sure all settings of pressure, speed, granular flow etc. are set according to specification from the calibration as previously performed.
 - 3 Where possible, apply the material beginning with the lowest concentration and work up to the highest concentration.
 - 4 Apply the material according to the directions in the protocol or as specified on the label. If fumigants or mist blowers are used, follow instructions of the manufacturer of the equipment. If a fumigant is used, two people are required, one doing the actual application and one who can observe from a safe place to provide rescue assistance if necessary.
 - 5 Calculations should be made to minimize the amount of spray material left in the spray tank. This residue should be sprayed to a similar crop or disposed of according to current policies and guidelines of their institution.

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Revision Date: March 12, 2018

Title: 6.5 Cleanup of application equipment

Purpose: To assure that pesticide application equipment is decontaminated without adversely affecting personnel or the environment.

Scope: All field and laboratory studies conducted under the direction of S.A. Clay and requiring GLP compliance and where pesticides application equipments are used.

- Procedures:**
- 1 Granules-Remove any excess granules and return them to the original container if this procedure does not affect the integrity of the contents or dispose of the excess by using appropriate methods for handling hazardous wastes. Note in the pesticide log for the chemical, the amount of granular material used in the study.
 - 2 In a suitable area away from aquatic areas or danger of aquatic contamination, hose down the granular applicator to remove pesticide dust from the inside and outside. Triple wash spray machines and apply each wash to the overplanting of the crop.
 - 3 Spray-Excess spray solution should be applied to an overplanting of the crop.
 - 4 If a crop overplanting is not available, then follow the disposal procedures for excess spray solution in accordance with current policies and guidelines of their institution.
 - 5 Add water to the sprayer tank until at least half-full. Add the recommended amount of a specialized sprayer cleaning solution to this water. Hand-shake the sprayer tank vigorously for at least 1 minute. Invert the tank and shake again for another 1 minute. Run this solution through the sprayer hoses and nozzles for at least 1 minute. Then, pour the remaining solution all over the sprayer, especially the boom and nozzles. Rinse the sprayer tank 3 more times with fresh water, each time pouring the water over the sprayer to rinse off the cleaning solution. Run fresh water through the sprayer hoses and nozzles for at least 1 minute.
 - 6 Dispose of expendable protective clothing by placing the items in a container for incineration. Clean non-disposable items following the manufacturer's instructions or with soap and water as appropriate.
 - 7 After the application equipment is dry, lubricate those parts requiring lubrication and return the equipment to storage.

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Revision Date: May 25, 2021

Title: 6.6 Storage and handling of test substances

Purpose: To explain the procedures required in the receipt, removal, use, and return and transfer of the test, control, and reference substances.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance. For the purposes of this SOP, test substance also applies to control and reference substances.

- Procedures:**
- 1 Test substance should be placed in proper storage as soon as possible to protect its integrity. GLP test substances should be stored separately from other pesticides. This information is often found on the pesticide label. If not available, store in a room that stays dry, has relatively ambient temperatures, and keep out of direct sunlight. Refer to SOP 13.2 for human safety guidelines that pertain to pesticide storage.
 - 2 When the test substance is received, the name on container, batch/lot number, date of receipt, expiration date, quantity received, amounts used, and purpose of use should be recorded in a log. Other information required by the study protocol will also be recorded in the field data book. Each entry should be initialed and dated.
 - 3 Each container should be labeled with a unique ID, which is usually the study number. If more than one container is received for a study, label as 1 of x, 2 of x, etc. A current inventory of all pesticides in the storage room should be posted nearby. This inventory will include the name of the pesticide as it appears on the container label, the number of containers received, the date received, the expiration date, and the trial ID number.
 - 4 Temperature recording with calibrated equipment (Refer to Section 4 for guidance) should begin within 2 days of receipt and continue until the final application. If using a manual min/max thermometer (as opposed to a datalogger), the minimum and maximum temperature needs to be recorded from the time a container enters the chemical storage facility through the final GLP application. At minimum, this can be a single measurement. However, more frequent measurements (i.e. weekly) during this timeframe are preferred.
 - 5 All test substance containers must be stored until notification, which usually found on the IR-4 Website. See Section 12 for Pesticide Disposal Guidance.

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Title: 6.7 Procedures to follow when a problem occurs in the application of the Test Substance.

Purpose: To explain the procedures required when something goes wrong during the application of the test substance in the study.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and when pesticides are used. For the purposes of this SOP, test substance also applies to control and reference substances.

- Procedures:**
- 1 During application, the applicator should observe the process to make sure that the test substance is being evenly distributed to the commodity.
 - 2 If something goes wrong such as a nozzle is plugged or a hose breaks, then the operator should take immediate action to correct the situation.
 - 3 The affected portion of the plot should be carefully marked off and staked to indicate the area affected. This portion should not be used for obtaining samples of the commodity for residue analysis. If the unaffected area is too small to obtain the samples required for analysis, then the trial should be discontinued.
 - 4 Appropriate individuals should be notified of the incident and details should be recorded in the raw data notebook.

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Revision Date: March 12, 2018

Title: 7.2 Recording of raw data and handling this data during QC Field Data Book review.

Purpose: To assure that raw data collected and recorded is accurate and available for audit.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Under most circumstances, raw data will be recorded into the field data book by supervisors only. Raw data shall be recorded in ink, preferably blue, so copies and originals can easily be distinguished.
 - 2 Date and initial each time an entry is made. Periodically have entries witnessed (signature and date) by another employee. If non-supervisors enter data, then their initials should accompany the data entry along with documentation of their training to perform the task which they are documenting (see SOP 2.3 Rev. 3.0 for further detail).
 - 3 If a document from a printer, copier, or fax machine constitutes raw data, then this printout should be initialed and dated in ink.
 - 4 Corrections will be made by single line crossing through the item and initialing and dated. A reason for the correction will be noted.
 - 5 No pages containing data will be removed from the book. Transcribing data is discouraged.
 - 6 If a particular form or section of the form does not require a response, make a slashed line (diagonal line from the top of the page or field to the bottom). Initial and date on the slashed line or sign and date at the bottom of the page. If the requested data are not applicable, give an explanation.
 - 7 Where raw transcends two or more studies, copies can be used to reduce the amount of paperwork. One study should be designated as one to contain the raw data. Each copy should contain a notation that reads:

True and Exact Copy
Initial Date _____
Original in _____

- 8 Make sure that all data required by the study protocol or by the forms provided or used are collected and recorded. Carefully review the forms to make sure that all the required data is being collected. This data includes but are not limited to:

- a. Names of all personnel conducting specific research functions
 - b. Amendments and deviations from protocol and SOPs
 - c. Test site information
 - d. Plot maps
 - e. Test substance
 - f. Test substance receipt, use and container/substance disposition records
 - g. Test substance storage conditions and temperatures
 - h. Data regarding calibration and use of application equipment
 - i. Treatment application data
 - j. Crop maintenance pesticides and cultural practices, test plot history, and soil information
 - k. Residue sample identification, collection, storage conditions, and handling
 - l. Residue sample shipping information
 - m. Description of crop destruction, or explanation for lack of destruction
 - n. Meteorological/Irrigation records
 - o. Pass times (if applicable) to confirm proper amount of material applied to plot
 - p. Equipment maintenance records with indication of routine vs. non-routine nature of maintenance
 - q. Other relevant data requested in Field Data Book to confirm study was done in accordance with protocol
9. Number each form as directed within each part of the raw data book.
 10. All completed Field Data Books will be submitted to the Regional Field Coordinator to review for completeness and accuracy. The Regional Field Coordinator or designee will follow up to obtain any missing data or correct deficiencies with the Field Research Director's consent.
 11. The Field Research Director or designee will add any additional or changed pages to the Field Data Book copy on file and these updated pages will be used for all subsequent quality assurance audits.

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Title: 7.3 Method for collecting efficacy and phytotoxicity data.

Purpose: To describe the procedure used for taking biological field data.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

Procedures: A. Phytotoxicity data:

- 1 Consult the protocol to determine the method and timing of the phytotoxicity data. If no method is cited then reference your method or proceed as follows:
- 2 Where possible, take phytotoxicity data within 1 week after each treatment or, if specified, by the phytotoxicity rating schedule in the specific IR-4 protocol being followed. If symptoms occur during this period that warrant a reading, then additional phytotoxicity data should be taken as necessary.
- 3 Often, quality photos of the phytotoxicity with a brief description are sufficient. Consult the Study Director to determine whether more detail and/or measurements are necessary.

B. Pest data:

- 1 Consult the protocol to determine the method and timing of the pest data. If no method is cited then reference your method(s) for each pest or proceed as follows:
- 2 Where possible, take pest data within 24 hours before the initial pesticide treatment and within 48 hours after the treatment and at various intervals thereafter depending on the pest life cycle and at the termination of the study.
- 3 Disease data-Record the name of the disease(s) being observed. Record the symptom(s) for each disease. Randomly select 5 plants in the middle row of each plot and record the severity of each disease in a rating system of 0 to 10 for each plant. Zero= plant healthy. Ten= Plant dead. One thru nine= the percentage disease appearing on the plant. If there are less than five plants/row, record data from 5 plants/plot or all the plants in a plot.

- 4 Insect data-Record the name of the insect(s) being observed. Record the damage symptom(s) for each insect. For damage symptoms-randomly select 5 plants in the middle row of each plot and record the severity of damage for each insect in a rating system of 0 to 10 for each plant. Zero= plant healthy. Ten= Plant dead. One thru nine= the percentage damage appearing on the plant. If there are less than five plants/row, record data from 5 plants/plot or all the plants in a plot.

For insect pest population counts-take a random sample of the pest population (i.e. 5 leaves/plant of 5 plants/plot, 4 3-in diam. soil cores/plot, 100 apples/tree etc.) to insure an accurate reflection of the pest density/unit area.

- 5 Nematode data-Record the name of the nematode(s) being observed. Record the damage symptom(s) for each nematode. For damage symptoms-randomly select 10 plants in the middle row of each plot and record the severity of damage for each nematode on each plant using one of the rating systems described by the following:

Barker, K.R., J.L. Townshend, G.W. Bird, I.J. Thomason and D.W. Dickson. 1986. Determining nematode population responses to control agents. In Kickey, K.D. (ed.). Methods for evaluating pesticides for control of Plant Pathogens. Pages 283-296.

If there are less than 10 plants/row, record data from all the plants in a row.

For nematode population counts-take a random sample of the pest population (i.e. root system of 2 plants/plot, 4 3-in diam. soil cores/plot, etc.) to insure an accurate reflection of the pest density/unit area as described by Barker et. al. cited above. Use a method suitable to extract the nematodes from the soil or plant sample and cite the method here. Count and record the number of nematodes by the various life stages/unit of soil or root.

- 6 Weed data-Visually observe each plot and record the % of the area (to the nearest 5%) covered by weeds. Record the names of the 5 most prominent weed species and the area they cover (to the nearest 5%) in each plot. Randomly place a grid covering an area of 0.1 M² and divided by quadrants in the plot. Where possible, count the number of weeds in the grid. If weeds are too numerous to make counting the entire area possible within a reasonable period of time, then count the number of weeds in the lower left quadrant, multiply by 4 and record this value as the number of weeds in the grid.

Weed Stress/Environmental Herbicide Fate Laboratory
South Dakota State University
Brookings, SD 57007
Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 7.4 Experimental design and data analysis

Purpose: To assure that all efficacy, yield, and phytotoxicity data developed is statistically sound

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 The experimental design as specified by the protocol should be used. If none is designated, then the researcher should use a commonly accepted experimental design such as a complete randomized block design. The experimental design used should be documented in the raw data notebook.
 - 2 A minimum of 3 replicates should be used (4 is preferred). No replicates or statistical analysis are required where the study is for magnitude of the residue only.
 - 3 Draw a plot map showing the location of each plot in the site selected for testing as described under SOP 3.2.
 - 4 Randomly assign the treatments to the plots using a random number table or random number generator. Note the location of the treatments on the plot map.
 - 5 Retain the plot map in the study folder.
 - 6 Determine the level of significance for the study.
 - 7 Select an appropriate statistical package for data analysis and record sufficient information to identify the statistical package (i.e. Date, Revision no., Title, Authors, Source etc.).
 - 8 When the raw data are available for analysis, utilize the statistical package and follow instructions contained therein to conduct an analysis of variance and mean separation of the data.
 - 9 Record the data as required on the appropriate forms and identify statistically significant differences in the data in the raw data note book.
 - 10 Retain all data, analyses, notes etc. in the study folder with sufficient information to recalculate the data summaries and statistical analyses by another person.

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Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 7.6 Collection and recording of data from electronic devices

Purpose: To describe methods for handling data from remote sensing and other data collecting devices.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

Procedures:

- 1 All remote sensing and other automatic data collecting and/or recording devices should be inspected and calibrated according to their respective SOP. If not required by GLP, some form of inspection and/or calibration is highly-recommended.
- 2 Check the power supply on portable units to see that it will be adequate during the data collection and data transfer period.
- 3 Make sure the correct program for data collection is ready and available for use.
- 4 Electronic data must be legible to persons with normal vision.
- 5 Electronic data should be transferred to a storage system and immediately printed out with appropriate identification. The original printout should have an initial and date of the person who performed the printing. If this original printout is inserted into the field data book, a copy should be retained at the field testing location.

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Revision Number: 4.0

Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 8.1 When to obtain residue samples.

Purpose: To assure that residue samples are collected in a timely fashion.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where studies are conducted to obtain residue samples.

- Procedures:**
- 1 Consult the study protocol to establish specific dates for the collection of samples. If these dates are based on uncontrolled events (fruit size, spray applications etc.) then tentative dates should be established and refined as necessary. The Study Director and Quality Assurance Research Officer should be kept informed when the dates are changed.
 - 2 Samples should not be taken during periods of inclement weather.
 - 3 Untreated samples should be collected first, followed by the lowest dosage rate and working toward the highest dosage rate.

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Field Research Director: Dr. Sharon Clay

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Submitted by: Kalyn Brix-Davis
Revised by: Graig Reicks

Submitted Date: May 1, 1993
Revision Date: June 10, 2020

Title: 8.2 Method of sample collection

Purpose: To assure that a sample representative of the commodity is taken.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where studies are conducted to obtain residue samples.

- Procedures:**
- 1 Follow the procedures stated in the protocol to collect representative samples of the plot.
 - 2 Avoid sampling the first and last 5 ft of the plot. Also avoid sampling the outside rows.
 - 3 Sample each replicate individually beginning with the untreated plots and working up to the highest dosage. Treatments from each replicate should be individually packaged and labeled.
 - 4 Take special care to do the following in the sample collection process:
 - a Avoid contamination of the field sample with the pesticide under study during the sampling, labeling, storage and shipping processes.
 - b Have one person hold the sample collection bag above the ground or place sample collection bag inside a container to avoid contaminating the outside of the bag when sampling treated plots.
 - c Avoid taking diseased or undersized crop parts.
 - d Take care not to remove surface residues during handling, packing or preparation.
 - e Do not transport samples in a vehicle used to transport pesticides.
 - f Be certain tools are clean.
 - g Do not remove any soil or plant parts or trim the commodity unless it is so specified in the study protocol (leave stem in cherry, outer leaves of lettuce on etc. unless specified otherwise in the protocol.
 - 5 Harvesting plant material in the field and transporting it back to SDSU for subsequent threshing is acceptable as long as the following criteria have been met:
 - a Harvested plant material to be threshed into samples should be in separate containers, each labeled with the Trial ID and the Sample ID.
 - b Temperature monitoring is not necessary if harvested plant material is threshed and samples are collected on the harvest date.
 - c Transportation should occur in a climate-controlled vehicle with a roof.
 - d Treated and untreated containers should be physically separated in the vehicle.

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South Dakota State University
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Field Research Director: Dr. Sharon Clay

Revision Number: 4.0

Submitted by: Zhuojing Liu
Revised by: Graig Reicks

Submitted Date: April 4, 1997
Revision Date: March 12, 2018

Title: 8.3 Method of sample collection using a combine or small bundle thresher

Purpose: To assure that a sample representative of the commodity is taken.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where studies are conducted to obtain residue samples.

- Procedures:**
- 1 Many protocols state that grain or seed samples can be collected with a combine or thresher. In this case, we must ensure that the machine is free of grain and/or other plant material from previous harvests. Cleaning a plot combine or small bundle thresher with a liquid solution that one might use to clean smaller sampling equipment is usually not practical on these large machines.
 - 2 If one can not see the entire inside of a harvesting machine to confirm its cleanliness, which is often the case with a plot combine, a sample should be collected from the plot that meets the sampling requirement stated in the protocol. This sample is considered a cleanout sample and should be run through the machine and properly discarded.
 - 3 In some harvesting machines, one can see inside the entire machine to confirm its cleanliness. This is usually the case with the small bundle thresher. Collecting a cleanout sample (as described in Procedure 2) is not necessary.
 - 4 Sample Collection Method 1 consists of feeding hand-collected plant material to a stationary combine or small bundle thresher operating outside the plot area. Follow the sample method collection method in the protocol.
 - 5 Sample Collection Method 2 consists of driving the combine through the plot and letting the machine collect the sample. Normally, a combine pass diagonally across the plot will suffice for a collecting a sample. Collect a second sample from the plot making a pass in the opposite direction.
 - 6 If the sample is too large, randomly remove handfuls of sample until it is of sufficient size. Record the approximate initial sample weight. The excess sample can be discarded on the ground of the respective plot for eventual destruction by tillage.
 - 7 Use the same procedure to harvest the treated plot or the treated plot of the next highest dosage.

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Field Research Director: Dr. Sharon Clay

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Submitted by: Kalyn Brix-Davis
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Submitted Date: May 1, 1993
Revision Date: May 25, 2021

Title: 8.5 Sample storage and freezer malfunction procedures.

Purpose: To assure the integrity of the samples after collection.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where residue samples are packed and stored.

- Procedures:**
- 1 If samples can be delivered to the freezers within approximately one hour of sampling, then immediate cooler storage on ice is not necessary.
 - 2 Carefully place the sample as it is collected in the sample bag marked for that sample. Make sure that labeling in the bag is enclosed with the sample.
 - 3 Close the sample bag so as to prevent loss of the sample under reasonable storage, handling, and transportation conditions. Excess air should be expelled from the bag.
 - 4 If storing samples temporarily in a cooler, use separate coolers for treated and untreated samples. As a rule of thumb, a 20 lb. bag of ice will be placed in each 48 qt. cooler. If samples will be in a cooler with ice for more than one hour, then temperature monitoring with a calibrated min/max thermometer will need to occur. Even if placed in coolers on ice, make every attempt to get the samples in the freezers as soon as possible. Samples should be in coolers no more than 4 hours.
 - 5 Samples should be shipped to the analytical lab as soon after collection as possible. Consult the study protocol for the method, temperature, and maximum length of time for storage. If specifications are not given in the protocol use as a rule of thumb for maximum temperature and storage times: -20°C. and 30 days for frozen commodities, 4°C. and 14 days for refrigerated commodities and 25°C. and 2 days for commodities held at room temperature. For frozen commodities, also place a test tube containing ice in the freezer, and monitor if any thaw happened during the sample storage period.
 - 6 When samples are being stored in the freezers, at least two individuals who have received GLP Training will serve as Sample Rescuers in the event of a freezer malfunction. At least one Sample Rescuer must be within a reasonable distance of the freezers at any given time.
 - 7 Each freezer will contain a calibrated temperature recording device (Refer to Section 4 for guidance) that will alert all Sample Rescuers with a recorded voice message and email to their mobile device when temperatures inside the freezer become warmer than -10°C. Even if a person receiving an alert is not available to tend to the freezer emergency, that person should still contact others to ensure the message wasn't missed.

- 8 A freezer warning doesn't require that the samples be immediately moved to another freezer. However, the temperature should be monitored closely to determine whether the freezer is truly malfunctioning.
- 9 If a malfunction is suspected, the first option will be to move the samples to the other main freezer, which usually stores the opposite treatment. A divider, boxes, bags, etc. could be used for separation of treated and untreated samples.
- 9 The freezers are in Room 053 of McFadden Biostress Laboratory, which has a backup generator. In the highly unlikely event that both freezers fail, prepare for shipment of the samples to the lab with dry ice. Purchase at least 2x the total sample weight worth of dry ice. Move temperature monitoring devices from the freezers to the dry ice boxes or coolers once the samples are inside with the dry ice and record temperatures until shipment.
- 10 Data that will be recorded during a freezer malfunction include the following:
 - The name or ID of the freezer that malfunctioned
 - Date and time that the malfunction alert was received
 - Date and time that the samples were removed from the malfunctioned freezer and added to a functioning freezer or cooler with dry ice
 - The min/max temperature of the malfunctioned freezer after the samples were removed, and whether water from the test tube filled with ice was observed.
 - The day and time when samples were returned to the main freezer(s)
- 11 All freezers should be under lock and key and only used to store GLP samples. The rooms where the freezers are situated should only have limited access.
- 12 In addition to the automated temperature monitoring system, each freezer should also contain a calibrated min/max thermometer as a backup. The min/max will be reset once per day, if possible. Temperatures will be recorded from the min/max each time it is reset.
- 13 An annual check of the alarm system will be performed prior to the sampling season. The freezers will be unplugged to see if everyone receives an alert on their mobile device. The results of these checks will be documented.
- 14 Attached to the storage facility (i.e. freezer, refrigerator etc.) should be a log of the items inside indicating the Trial ID#, contents (e.g. treated sunflower seed), day/time in, and day/time out. An initial should accompany each entry.
- 15 All people who receive freezer failure alerts should have keys to all buildings and rooms necessary to successfully execute a sample rescue.

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Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 8.6 Sample packaging and shipping procedures

Purpose: To assure that residue samples are removed from storage and shipped to the residue laboratory with a minimum loss of integrity.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where residue samples are shipped.

- Procedures:**
- 1 Contact the Chemist at the residue laboratory by telephone or e-mail before the shipment, if possible. Inform this person of the project number, the sample ID's being shipped, shipment dates, and the name of the carrier. Ask for any special instructions in shipping the samples. Air freight shipments should be made on Monday or Tuesday to avoid potential weekend layovers.
 - 2 Complete residue sample shipping form(s), make copies and send them to the study director, regional coordinator and residue chemist.
 - 3 Make arrangements with the carrier for shipment of the samples and determine any special packing instructions etc. that is required to preserve the sample integrity. Note any limits on quantity of dry ice etc. that may be set by the carrier.
 - 4 When shipping with dry ice, use highly-durable insulated coolers and pack in a 1:4 commodity:dry ice weight ratio. Dry ice should be underneath, on top, and around as many sides of the sample(s) as possible. Fill voids with packaging material such as crumpled paper. Aim to have the sample received by the residue laboratory within 24 hrs. of packaging. Shipments should be made on Monday or Tuesday, but absolutely no later than Wednesday.
 - 5 Place the copy of the residue sample shipping form in a waterproof container and place it in one of the sample shipping containers.
 - 6 Label each container with the following information:
 - a. Return Name and Address of the sender
 - b. Name and Address of the residue laboratory receiving the samples.
 - c. Number of the container if more than one is used.
 - d. Affix "Experimental Samples-Perishable" on each carton

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Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 10.1 General procedures - Archives

Purpose: To assure that each location conducting GLP studies establishes and maintains an archives facility for retention of all data and documents connected with the program.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 At the end of the field season, all field data notebooks will be transferred to IR-4 Headquarters.
 - 2 Copies of these field data books shall be retained in the archives of this testing facility until it's officially announced (usually on IR-4 website) that copies can be destroyed.
 - 3 Archives should be a limited access facility (i.e. locked room or cabinet).
 - 4 The facility should be in a building with adequate fire protection.
 - 5 Archives should only be accessed and/or maintained by the Field Research Director or some other qualified individual the FRD designates to perform this task.
 - 6 Some original data will be stored in the archives. These documents can include organizational charts, facility maps, reports from audits, and other relevant information.

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Submitted by: Kalyn Brix-Davis

Revised by: Graig Reicks

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Revision Date: March 12, 2018

Title: 12.1 Disposal of pesticides.

Purpose: To assure that pesticide concentrate, spray solutions, rinse water, and containers are disposed of with minimal environmental contamination and in accordance with federal, state and local regulations.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where pesticides are disposed.

Procedures:

- 1 Personnel dealing with pesticides disposal should follow current policies and guidelines of their institution (A copy should be attached to the SOPs as an appendix).
- 2 Where institutional guidelines do not exist, the procedures under SOP 12.2 should be followed.

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Field Research Director: Dr. Sharon Clay

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Submitted by: Kalyn Brix-Davis
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Revision Date: March 12, 2018

Title: 12.2 Guidelines for the disposal of pesticides.

Purpose: To assure that pesticide concentrate, spray solutions, rinse water, and containers are disposed of with minimal environmental contamination and in accordance with federal, state and local regulations.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance and where institutional guidelines for disposal of pesticides do not exist.

Procedures:

- 1 Disposal of pesticide concentrate and/or containers.
 - a. Personnel dealing with pesticides disposal should follow current policies and guidelines of their institution (A copy should be attached to the SOPs as An appendix).
 - b. Follow procedures in the protocol. Generally, the pesticide and/or empty containers cannot be disposed of under GLP until the study is completed and the QA unit has signed off. If it is necessary to dispose of the container prior to the end of the study, the Study Director should be consulted.
 - c. Where possible, the pesticide concentrate and containers should be returned to the registrant or manufacturer. Transportation must be according to all Federal, State, and local laws and regulations.
 - d. Follow label directions for disposal of the pesticide if option 1.b is not available.
 - e. If no label directions exist for disposal, arrangements should be made with a licensed waste disposal firm for pickup and disposal of the pesticide and/or the empty containers.
- 2 Disposal of pesticide rinse water, unused spray solutions and other dilute pesticide waste.
 - a. Check State and local laws and regulations to determine any procedures that may exist for proper disposal of pesticide solutions.
 - b. Dispose of the dilute pesticide waste in the field by adding to the spray tank and spraying on an overplanting of the crop where this procedure does not violate any laws or regulations. All pesticide solutions should be mixed with the intent of limiting the problem of excess solution.

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Title: 13.1 Safety and health procedures in handling pesticides

Purpose: To assure that personnel handling pesticides are doing so in a safe manner and if an accident occurs, danger is minimized.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance (including greenhouse).

- Procedures:**
- 1 Personnel should follow current policies and guidelines of their institution when handling and storing pesticides (A copy should be attached to the SOPs as an appendix).
 - 2 Where institutional guidelines do not exist, the procedures under SOP 13.2 should be followed.

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Revision Date: March 12, 2018

Title: 13.2 Guidelines for storing and handling pesticides safely.

Purpose: To assure that personnel handling pesticides are doing so in a safe manner and if an accident occurs, danger is minimized.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance where institutional guidelines for handling pesticides do not exist.

- Procedures:**
- 1 Store pesticides in a well-ventilated room where fire protection is available. The storage room should have a highly visible warning sign placed on the door. Unless supervised, only authorized personnel should be in the pesticide storage room.
 - 2 Do not store pesticides next to food, beverages, eating utensils, or other articles intended for consumption or use by humans or animals.
 - 3 Make accessible, materials such as adsorptive clay, granulated activated charcoal, hydrated lime, and sodium hypochlorite for emergency treatment or detoxification of spills or leaks.
 - 4 All personal protective equipment and clothing as required by the label or written SOPs should be worn in the handling of pesticides for storage, mixing and application. Emergency personal protective equipment (e.g. coveralls, self-contained breathing apparatus) must be available when handling hazardous pesticides such as restricted use pesticides.
 - 5 Wear unlined rubber gloves while handling containers and mixing or measuring pesticides.
 - 6 Wash hand thoroughly with soap and water immediately after handling pesticides and especially before eating, smoking, or using the toilet.
 - 7 At the end of the working day employees who have applied or mixed pesticides should take a shower and change clothes. Clothing should be washed after the end of the day. In no case should the same clothing, including shoes, be worn on a second day after it has been worn during a pesticide application.
 - 8 A pesticide-treated area, greenhouse, or field should not be entered until adequate time, as specified on the label of the pesticide, has been allowed for the treated area. Treated field should be posted with warning signs after a pesticide application.
 - 9 For persons who regularly handle organophosphates and/or large quantities of carbamates, a cholinesterase level should be determined at least monthly throughout the pesticide application season.

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Revision Date: March 12, 2018

Title: 14.1 Procedures to follow prior to an announced EPA inspection.

Purpose: To provide guidance to study personnel in responding to a request for An EPA audit or review by OCM.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Notify the Study Director and other interested personnel of the pending audit or review as soon as possible.
 - 2 Arrange to have available the personnel who may be associated with the study or facilities audit.
 - 3 Make sure someone who is authorized to accept the Notice of Inspection is going to be present at the start and finish of the inspection.
 - 4 Prepare study and/or facilities personnel for the inspection.
 - a. Discuss position descriptions with technical personnel so they understand and can explain their role in the study.
 - b. Discuss possible questions that may likely come up about the study or facility and make sure every one understands what to expect.
 - c. Request personnel to answer the questions only to the extent needed and not to provide extraneous information. Do not volunteer information; keep answers direct and to the point.
 - d. Make certain that technical personnel know the safety precautions needed for the work area.
 - e. Be certain that all documents pertaining to the study/facilities inspection are available. This would include:
 - 1) Master schedules for both the field research director, Quality Assurance Research Officer and possibly their counterparts at the region and IR-4 headquarters.
 - 2) Study Protocol and Standard Operating Procedures

- 3) Raw data, correspondence and logs.
 - 4) Training records, CVs etc. of personnel assigned to the study.
 - 5) Appropriate chain of custody documents for samples and freezer logs and storage temperature documentation.
 - 6) Documentation of the characterization of the test substance, receipt and handling.
 - 7) Calibration logs on equipment such as balances and application equipment.
 - 8) Archives or storage of records and logs indicating removal and replacement of documents.
- 5 Have accessible organizational charts, a map of the facility and any information specific to the facility or area that will make the inspection go smoother (restaurants, motels etc.)

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Field Research Director: Dr. Sharon Clay

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Submitted Date: May 1, 1993
Revision Date: March 12, 2018

Title: 14.2 Procedures to follow during an EPA inspection.

Purpose: To provide guidance to study personnel in responding to a request for An EPA audit or review by OCM.

Scope: All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.

- Procedures:**
- 1 Greet the inspection team and follow any institutional procedures for signing in. Provide name tags and escort the entire group to a conference or meeting room.
 - 2 At the opening of the conference ask the lead inspector for his credentials and for any opening statements.
 - 3 Introduce the facility personnel present and state their function in the facility or study. Identify the person responsible who will accept the Notice of Inspection.
 - 4 Distribute organizational charts, map of the facility and any other information previously prepared to make the inspection go smoother.
 - 5 Ask the lead inspector for his/her agenda for the inspection as well as a list, if possible, of personnel for interview during the inspection.
 - 6 Explain any housekeeping rules such as the use of safety equipment in work areas etc. to avoid any possible misunderstandings.
 - 7 Proceed with the inspection.
 - a. Provide documents requested and provide explanations needed.
 - b. Keep notes of observations and of all interviews.
 - c. Keep management informed of the progress of the inspection and the findings.

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Field Research Director: Dr. Sharon Clay

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Submitted by: Kalyn Brix-Davis
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Revision Date: March 12, 2018

- Title:** 14.3 Procedures to follow after the EPA inspection.
- Purpose:** To provide guidance to study personnel in responding to a request for An EPA audit or review by OCM.
- Scope:** All field and laboratory studies conducted under the direction of S. A. Clay and requiring GLP compliance.
- Procedures:**
- 1 Make sure that all personnel involved in the inspection are present for the closeout conference.
 - 2 If the inspector's comments are in error, call this to the inspector's attention. Remember the close out conference is not the forum for any debate.
 - 3 If you have corrected any problems during the inspection make sure the corrections are so noted in the inspector's logbook.
 - 4 Have someone present during the close-out take accurate notes or record the conference on tape if taping is acceptable to the inspectors.
 - 5 Be sure you obtain a copy of the list of documents or other materials that may be taken as exhibits by the inspectors.
 - 6 Debrief management, staff, and the Study Director with an explanation of any problems found.
 - 7 Assign responsibility for preparation of possible solutions to problems and obtain time estimates for implementation.
 - 8 Prepare any replies to the regulatory agency as necessary within a timely basis and keep interested parties such as management and the Study Director informed.