

US EPA ARCHIVE DOCUMENT

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DATE OUT: 14/NOV/2007

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE TGAI [X]**
DP BARCODE #: D346341 EPA RECEIVED DATE: 06/NOV/2007 FILE SYMBOL/REG 62719-518
PRODUCT NAME: Aminopyralid technical FOOD USES [X]
COMPANY NAME: Dow AgroSciences LLC MRID: 472660-01 ACTION CODE: R34
PPC NUMBER OF THIS TGAI: 005100 DECISION NO.: 373717

FROM: Sami Malak, Chemist *S. Malak for S. Mathur*
Technical Review Branch/RD (7505P)

TO: 25 James Tompkins/Kathryn Montague
Herbicide Branch/RD (7505P)

INTRODUCTION:

In a letter dated 25/OCT/2007, the applicant requested amended registration of subject product. Included with this submission was MRID #472660-01 pertaining to Group "A" product chemistry data, a supplement to a previously submitted data in MRID #470294-01. No label or CSF were included.

FINDINGS:

The submitted data in MRID #472660-01 pertaining to Group "A" product chemistry was previously submitted and reviewed in connection with a product chemistry memorandum (DP #336048, S. Mathur, 25/APR/2007). In that memorandum, it was apparent that a revised basic CSF dated 08/JAN/2007 was acceptable and a recommendation was made that it supersede a previous basic CSF dated 22/AUG/2005. The reviewer, however, requested additional information on a new impurity that was detected in the preliminary analysis and listed in the accepted CSF dated 08/JAN/2007.

According to the applicant's cover letter the requested information regarding the new impurity was submitted in MRID #472430-01 in addition to a previously reviewed subchronic and chronic studies.

The name of the new impurity and our assessment are cited in Confidential Appendix A.

CONCLUSIONS:

The summary information in Confidential Appendix A regarding the new impurity can be forwarded to HED for their assessment as to its toxicological significance.

cc: S. Malak and Database Files (Reg. No. 62719-518)
7505C:RD:TRB:CM-2:Rm.268:s.m.:14/NOV/2007:703-308-9365:<62719-518>

Page 2 is not included in this copy.

Pages through are not included in this copy.

The material not included contains the following type of information:

 Identity of product inert ingredients.

 Identity of product impurities.

 Description of the product manufacturing process.

 Description of quality control procedures.

 Identity of the source of product ingredients.

 Sales or other commercial/financial information.

 A draft product label.

 X The product confidential statement of formula.

 Information about a pending registration action.

 FIFRA registration data.

 The document is a duplicate of page(s) .

 The document is not responsive to the request.

 Proprietary information pertaining to the chemical composition of an inert ingredient provided by the source of the ingredient.

 Attorney-Client Privilege.

 Claimed Confidential by submitter upon submission to the Agency.

 Internal Deliberative Information.

* The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
