MEMORANDUM


FROM: Leung Cheng, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Robert Taylor, PM 25
Fungicide-Herbicide Branch
Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

Drexel Chemical Company has requested to register an alternate source of atrazine for use in its Drexel Atrazine Technical (EPA Reg No 19713-7).

The package sent from your Division consists of a cover letter, a data reference sheet, five toxicological studies and a copy of gas chromatogram. In the absence of requisite data (see below), we are unable to compare the product chemistry of atrazine from this alternate source with the currently registered product.

Conclusion and Recommendation

In the absence of requisite data listed in the Pesticide Assessment Guidelines, Subdivision D, §61 through §64, we are not able to compare the product chemistry of the proposed source of atrazine with the currently registered product. We recommend Drexel to submit the following: product identity and disclosure of ingredients (§61-1); description of beginning materials and manufacturing process (§61-2); discussion of the formation of impurities (§61-3); analysis of at least five representative samples including sample chromatograms, spectra or curves along with a description of the analytical method (§62-1); certification of ingredient limits (§62-2); analytical methods to verify certified limits (§62-3); physical and chemical characteristics (§63) and submittal of a sample (§64).

cc:Circ, RF, Atrazine SF, Cheng, PMSD/ISB