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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

## JUL 8 1985

## MEMORANDUM

SUBJECT:

EPA Reg No 19713-7. Registration of Attracing toxic substances

"Me-Too". Accession Number 257365. RCB No 898.

FROM:

Leung Cheng, Chemist

Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

THRU: Charles I Trichile object

Charles L. Trichilo, Chief Residue Chemistry Branch

Hazard Evaluation Division

TO:

Robert Taylor, PM 25

Fungicide-Herbicide Branch

Registration Division

and

Toxicology Branch

Házard Evaluation Division

(TS-769)

(TS-767)

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 RDI:ARRathman:7/8/85:RDSchmitt:7/8/85 TS-769:RCB:LCheng:CM#2:RM804:557-7484:7/8/85

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