DATE OUT: DEC 08 1995

DP BARCODE: D221337 **SUBMISSION:** S497633 **REG/FILE SYMBOL No.:** 1812-GAG
CHEMICAL NAME: 080808 2-Chloro-4,6-bis(isopropylamino-s-triazine
COMMON NAME: Propazine **CAS Registry No.:** 139-40-2

REGISTRATION DIVISION/REGISTRATION SUPPORT BRANCH/PRODUCT CHEMISTRY REVIEW SECTION TRANSMITTAL/PRODUCT CHEMISTRY REVIEW OF A REGISTRATION ACTION FOR A TECHNICAL GRADE ACTIVE INGREDIENT, ACTION CODE 627, NEW CHEMICAL/NON-FOOD/FEED USES

DATA SUBMITTER: 001812 Griffin Corporation **RECEIVED DATE:** 08/29/95
MRID #: 438405-01
RD PM#/NAME: 25 Robert Taylor **Phone #:** 305-6800
RD CRM NAME: Terri Stowe **Phone #:** 305-7740

INTRODUCTION:

With this submission, the registrant, Griffin Corporation, responded to the deficiencies cited in our previous memorandum for technical propazine, Reg. No. 1812-GAG (S. Malak, 9/26/95, DP #219079). Data gaps cited in the 9/26 memorandum were: product stability (63-13), storage Stability (63-17), odor (63-4), and submittal of samples to EPA's Analytical Chemistry Laboratory in Beltsville, Maryland and the Pesticide and Industrial Chemical Repository in Research Triangle Park, North Carolina. Further, a deferral to TOX was requested for clearance of some impurities.

FINDINGS:

1. GRN 63-4 Odor: Slightly waxy odor.

2. GRN 63-13 Stability: Data Gap.

3. 63-17: Storage Stability: The submitted study, MRID #438405-01, entitled "Technical Propazine, One Year Storage Stability Assay", was authored by Carol Dowler of Griffin Corporation, completed on 8/7/95, 17 pages.

   In the study, samples from 15 lots, three each from five batches of technical propazine were stored in high density polyethylene (HDPE) jars for a period of one year under ambient warehouse conditions. Griffin analytical standard #SAN0177 propazine, 98.2% pure, was used as a reference standard. After the storage period of one year, all 15 lots were analyzed using Griffin's test method TM-1103.

   Test results gave assays ranging from 96.6 to 98.0%, averaging 97.3% for all 15 lots. No analysis was performed prior to the storage. Further, sample age from production to storage was not reported. the nominal concentration of propazine

technical was previously reported and documented in our 9/26/95 memorandum at 96.6%.

CONCLUSION: Technical propazine, Reg. No. 1812-GAG is stable for one year when stored in HDPE jars under ambient warehouse conditions.

4. GRN 64-1 Submittal of Samples: According to the registrant's letter of 10/18/95, samples of propazine technical were sent to the designated laboratories: EPA's Analytical Chemistry Laboratory in Beltsville, Maryland and the Pesticide and Industrial Chemical Repository in Research Triangle Park, North Carolina.

5. Deferral To TOX/HED: This issue should be resolved by the PM and the TOX Branch/HED.

RECOMMENDATIONS

After resolving Finding 2 above, we can recommend for registration of Propazine Technical, Reg. No. 1812-GAG.

NOTE TO PM:

1. The results of method validation by EPA's Analytical Chemistry Laboratory in Beltsville, Maryland, should be submitted for our evaluation.

2. Please note Finding #5 above.

Eda Malak — 12/08/95
Reviewer: Sami Malak, Ph.D., Chemist — **Date**

H Podall — 12/11/95
Section Head: Harold Podall, Ph.D., Chemist — **Date**

cc: Sami Malak and Central File (Reg. No. 1812-GAG).
7505W:RD:RSB:PCRS:S.Malak:CS-1:Rm650:s.m.:12/08/95:308-8392:<1812-GAG.B>