

US EPA ARCHIVE DOCUMENT

Date: 27/Aug./2002

SUBJECT: EP [X] MP [] PRODUCT CHEMISTRY REVIEW --ACTION: 161
DP BARCODE No. D284491 EPA Reg.No.42750-67
PRODUCT NAME: GLY STAR CONCENTRATE
COMPANY: ALBAUGH INC.

TO: PM 25: Jim Tompkins/Juanita Gilchrist, PM Team Reviewer
Branch: Herbicide
Registration Division (7505C)

FROM: Harold Podall, Ph.D., Chemist *H. Podall 8/28/02*
Technical Review Branch/RD(7505C)

INTRODUCTION\DESCRIPTION OF SUBMISSION:

On behalf of Albaugh Inc., Pyxis Regulatory Consulting has submitted response (dated 4/12/02) to the EPA letter of 3/19/02 and to the accompanying technical review for D279113 dated 12/28/01, wherein they are requesting the EPA to reconsider its findings and continue its processing of the subject registration. In addition to the detailed letter, a Table summarizing the CSFs for GLY STAR Concentrate, its Label, and copies of the CSFs dated 10/8/01 were provided in support of their request.

SUMMARY OF FINDINGS:

1. From the Table provided it is clear that the basic and alternate formulations for GLY STAR CONCENTRATE are identical as claimed.
2. There was no response to the 1st Finding of my review of 12/29/01 wherein it was stated there that it appeared that "there is a significant difference in the compositions of the two products", i.e. the subject product and the registered product of Monsanto's "Roundup Weed & Grass Killer Concentrate", EPA Reg.No.71995-26.

CONCLUSIONS/RECOMMENDATIONS:

1. It is suggested that the CSFs for the basic and alternate formulations be revised to include a footnote to the active ingredient in question and to spell out the composition of the respective technical in the footnote. Alternatively, a copy of the CSF of the technical in question may be attached to each of the CSFs.
2. A response to the 2nd Finding above should be provided with the resubmission.