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

FEB 3 1987

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA File No 618-OL. Abamectin (Avermectin or AVM B₁). AFFIRM® Technical Product Chemistry. Merck's Submission dated August 4, 1986. No Accession Number. RCB No 1338.

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THRU: Edward Zager, Section Head, SRS II *EZager*
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TO: George LaRocca, PM #15
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Merck, Sharp & Dohme has submitted revised certified limits for abamectin (avermectin B₁) and related impurities, and data on explodability and stability in response to RCB's review dated May 1, 1986.

The revised certified limits for abamectin are detailed in the Confidential Appendix to this review.

Merck also had recalculated the results of the preliminary analysis for AFFIRM Technical.

Merck stated that since AFFIRM Technical is a moist solid, "this manufacturing-use product is not explodable".

The registrant also stated that the product is somewhat photolabile, but "no correlation has been found between metal ion levels (iron, nickel, cobalt) and sample stability" although "contact with metal ions should be avoided." We assume this to mean that the AFFIRM Technical is unstable towards metal ions.

CONCLUSIONS and RECOMMENDATION

1. The revised certified limits on abamectin (avermectin B₁) are acceptable.

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2. Results from the preliminary analysis on AFFIRM Technical are acceptable.

3. The Company has provided data on stability and explodability for the product.

We now recommend for the registration of AFFIRM® Technical.

Attachment: Confidential Appendix (1 page)

cc(without Attachment): Circ

cc(with Attachment): RF, SF, Cheng, PM#15, Amended Use F, PMSD/ISB only

RDI:EZager:2/2/87:RDSchmitt:2/2/87

TS-769:LCheng:CM#2:RM810:Date:2/2/87:557-7324:6

Page 3 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.
 - 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.
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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.
