

US EPA ARCHIVE DOCUMENT

DATE OUT: 11/07/2001

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]
DP BARCODE No.:D278196 REG./File Symbol No.:100-895
Updated Basic CSF for Abamectin Technical with greater Purity.

PRODUCT NAME: AFFIRM TECHNICAL

FROM:

Indira Gairola 11/07/01
Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

TO:

TINA LEVINE PM 04
Insecticide Branch/RD(7505C)

INTRODUCTION:

SYNGENTA CROP PROTECTION, INC has submitted updated basic CSF(08/31/01) and enforcement analytical Methods of analyses for greater concentration of active ingredient in the technical source. Details are mentioned below.

SUMMARY OF FINDINGS:

1. SYNGENTA CROP PROTECTION, INC. has upgraded basic CSF (08/31/01) by increasing the concentration of active ingredient Abamectin from 85.0% to 90.0%,
2. SYNGENTA has omitted "Related compounds" with no determined active status and added their percentage into Other Ingredients which has been changed to 10.0%
3. Mass Spectrometry and liquid chromatography were used as Analytical Methods of analysis.
4. The updated basic CSF (08/31/01) is unacceptable on account of the following reasons:
 - a) There is too much of variation between the upper and lower certified limits and the nominal concentration. The

①

certified limits of Abamectin technical are not within the standard limits as per 40CFR§158.175. These limits should be $\pm 5\%$ of the nominal concentration.

- b) The remaining certified limits where applicable need to be corrected likewise.
 - c) In order to have correct understanding NOA-422601 (Avermectin Ba) and NOA-421704 (Avermectin Aa) should be linked together
 - d) Likewise NOA-422601 should be linked with NOA-421704 in order to determine correct purity.
5. On account of the aforementioned reasons TRB cannot accept The CSF dated (08/31/01).

CONCLUSIONS:

TRB has reviewed the aforementioned request concludes :

- 1. The proposed updated CSF (08/31/01) cannot be accepted on account of the reasons mentioned in the Summary of findings.
- 2. If the applicant wishes this to be considered applicant must comply with items No4 a, b, c and d, as stated in the summary of findings.

②