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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

APR 21 1987

SUBJECT: EPA File Symbol 241-EOI
Arsenal Herbicide Railroad Applicators Concentrate

FROM: Mary L. Waller
Technical Support Section
Fungicide-Herbicide Branch
Registration Division (TS-767C)

E 4/28/87

TO: Robert J. Taylor, PM 25
Fungicide-Herbicide Branch
Registration Division (TS-767C)

APPLICANT: American Cyanamid Company
Agricultural Research Division
P.O. Box 400
Princeton, NJ 08540

ACTIVE INGREDIENT:
Isopropylamine salt of Imazapyr (2-[4,5-dihydro-4-
methyl-4-(1-methylethyl)-5-oxo-1H-imidazole-2-yl]-
3-pyridinecarboxylic acid) 53.1%
INERT INGREDIENTS: 46.9%

BACKGROUND:

The applicant has provided information and Confidential Statements of Formula (CSF) for the product tested and the product for which registration is sought. This information was requested in the February 3, 1987 TSS review of the acute toxicity data.

RECOMMENDATION:

FHB/TSS findings are as follows:

1. The applicant's explanation provided in a March 17, 1987 letter by Mr. William Stellar of Cyanamid that the product tested was Arsenal Herbicide 4-AC and not

4-AS is acceptable. The letter states that "4-AS" was a typographical error made by the testing laboratory.

2. FHB/TSS finds the data on Arsenal Herbicide 4-AC acceptable to support registration of Arsenal Herbicide Railroad Applicator's Concentrate based on the applicant's statement in the March 17 letter that both products are the exact same formulation and the CSF's for the two products.

LABELING:

Proposed labeling is acceptable.