MEMORANDUM

January 26, 1994

Subject: Review of the supplementary data on Series 61-2.

From: Shyam B. Mathur, Chemist
PCRS/RSB/RD(H7505W)

To: Joseph Tavano
RD(H7505C)

Through: Harold Podall, Section Chief
PCRS/RSB/RD(H7505W)

Attached please find the Product chemistry review on the supplementary data submitted on Series 61-2 for the Technical Sumilarv(EPA Reg. No. 10308-RR). Thank you.
CONFIDENTIAL
DP BARCODE D196989 SUBMISSION S452464 REG. No. 010308-RR CHEMICAL
129032 2-[1-methyl-2-(4-phenoxyphenoxy)ethoxy]Pyridine
COMPANY Sumitomo Chemical Co.

In response to the Product chemistry reviews dated September 2 and September 13, 1992 on Sumilarv Technical Insecticide, the Technology Sciences Group Inc. on behalf of the Registrant submitted (October 20, 1993) supplementary product chemistry data on Series 61-2 (beginning materials & manufacturing process). The Agency requested additional data on the following topics:

Listing of process equipment, a description of quality control process, information on methods used to remove possible contamination from manufacturing equipment resulting from prior use, information regarding the possibility of post production reactions, information on the possible migration of impurities from packaging materials, information on the source of impurities identified in the CSF, and information on the possible formation of nitrosamines, dioxins, dibenzofurans.

The Registrant submitted following additional information on beginning materials & manufacturing process:
(MRID No. 429892-01)

1. Process Equipment:
Page____ is not included in this copy.
Pages 3 through 4__ are not included.

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.

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.
Conclusions:

The supplementary data submitted by the Registrant for the chemical Sumilary Technical grade (EPA Reg. 10308-RR) corresponding to Series 61-2 (Beginning materials Manufacturing process) and 61-3 (discussion on the formation of impurities) satisfy the data requirements of 40CFR§ 158.150.