

DATE: Sept. 13, 2002
DP BARCODE: D284621
EPA REG. NO.: 600063-ER
REGISTRANT: SIPCAM AGRO USA, INC..
USE: Herbicide

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IA 09/13/02
FROM: Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

SR 9/13/02

TO: JOANNE MILLER PM 23
Herbicide Branch/RD(7505C)

INTRODUCTION:

Sipcam Agro USA, Inc. has submitted Product Chemistry data to support the registration of Prodiamine Technical.. Sipcam claims their product to be substantially similar to EPA Reg. No. 100-833.

SUMMARY OF FINDINGS:

Sipcam has submitted Guideline reference 830.subgroup A for Prodiamine Technical MRID Nos 457166-01 and 457166-02.

Sipcam Agro USA, Inc claims their product to be substantially similar to EPA Reg. No.100-833. The submitted data for the subject product was reviewed and details will be discussed in the following pages .

1. Product Chemistry data for Subgroup A satisfy the data requirements of 40 CFR part 158.155 to 158.180 and are acceptable except the CSF.
2. The Basic Formulation CSF dated 05/22/02 is not filled out completely and correctly and found unacceptable on account of the reasons mentioned in the Confidential Appendix:
3. Sub Group B Guidelines Series 830.1550-830.7950 have not been submitted since they are cited as identical.
4. The GC/MS method for determination of Prodamine TGAI for five lots indicated that the pure material has an average purity of 93.0 % . The Analytical Method submitted to support the Enforcement limit has been found acceptable.

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5. There is considerable difference in the impurity profile of the subject product Prodamine Technical as compared to the referenced product EPA Reg. No. 100-833 that has greater number of impurities
6. Sipcam Agro USA, Inc. Company claims their product to be substantially similar to EPA Reg. No. 100-833 . TRB has reviewed this claim and does not consider the subject product to be substantially similar to EPA Reg. No. 100-833 on account of the reasons #5.mentioned above.

CONCLUSION :

1. Product Chemistry data for Subgroup A satisfy the data requirements of 40 CFR part 158.155 to 158.190 and are acceptable except for the CSF.
2. Sub Group B Guidelines Series 830.1550-830.7950 have not been submitted since they are cited as identical.
3. The Basic Formulation CSF dated 05/22/02 is not filled out completely and correctly and found unacceptable on account of the reasons mentioned in the Confidential Appendix:
4. TRB does not consider the subject product to be substantially similar to EPA Reg. No. 100-833 on account of the reasons #6.mentioned above.