

DATE OUT: 31 Mar 2007

SUBJECT: **PRODUCT CHEMISTRY REVIEW** MP [] EP [x]
DP BARCODE No.: D333096
Reg. File Symbol No.: 62719-LTE
PRODUCT NAME: GF-1883
COMPANY: Dow AgroSciences LLC
Decision No.: 370943 PC CODE: 116002
FOOD USE: [] Integrated Formulation []

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Technical Review Branch
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Bruce Kitchens 3/31/07
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TO: RM #23, Joanne Miller/Eugene Wilson
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INTRODUCTION:

The registrant, Dow AgroSciences, is submitting an application to register the proposed end-use product, GF-1883. The active ingredients in this product are Aminopyralid TIPA and Triclopyr TEA at label nominal concentrations of 2.22 and 16.22% a.i., respectively. This product is intended for use as an herbicide. In support of this request, the registrant has submitted a basic Confidential Statement of Formula (CSF) dated 29 Aug 2006, a draft label, and product chemistry data contained in MRID#s 469424-01 and 469424-02. The Technical Review Branch (TRB) has been asked to review this submission.

SUMMARY OF FINDINGS

TRB has reviewed this submission and reports the following findings:

1. This product is produced from registered sources of the active ingredients.
2. All inert ingredients are cleared for use in formulated pesticide products.
3. The nominal concentrations of the active ingredients listed on the proposed CSF and the draft label are the same.
4. The draft label contains the appropriate storage and disposal statements.
5. The active ingredients' certified limits as proposed on the basic CSF are acceptable.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

1. The basic formula CSF for the proposed end-use product, GF-1883 dated 29 Aug 2006 is acceptable.
2. This submission satisfies the data requirements as specified in 40 CFR 158.155, 158.160, 158.165, 158.167, 158.175, and 158.180 with respect to product identity and composition, description of materials used to produce the product, description of formulation process, discussion of formation of impurities, certified limits, and enforcement analytical method.
3. Except for storage stability/corrosion characteristics studies, the remaining product chemistry Group B data (MRID# 469424-02) adequately fulfill the data requirements. Inform the registrant that a 1-year study for storage stability and corrosion characteristics is required to satisfy these data requirements.

PRODUCT CHEMISTRY DATA (SERIES 830 Subgroup A)

Subgroup A – Product Identity and Composition	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity	Y	469424-01
830.1600. Beginning Materials	Y	469424-01
830.1650. Formulation Process	Y	469424-01
830.1670. Discussion of Impurities	Y	469424-01
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits	Y	469424-01
830.1800. Enforcement Analytical Method	Y	469424-01

Enforcement Analytical Method: (MRID No. 469424-01)

The active ingredients, Aminopyralid TIPA and Triclopyr TEA, were determined by reverse phase high performance liquid chromatography (HPLC) using ultraviolet detection (UV) at 225 nm with internal standard quantitation. The method was validated for accuracy, linearity, precision, interferences, solution solubility and ruggedness.