

DATE OUT: 31 Jan 2005

SUBJECT: EP  MP  PRODUCT CHEMISTRY REVIEW  
DP BARCODE No.: D304583  
REG./File Symbol No.: 7969-ENL  
PRODUCT NAME: BAS 670 336SC Herbicide  
COMPANY: BASF Corporation  
FOOD USE:  PC CODE: 123009  
Decision No. 211978 Integrated Formulation

TO: RM #23, Joanne Miller/James Stone  
Herbicide Branch  
Registration Division (7505C)

FROM: Bruce F. Kitchens, Chemist  
Technical Review Branch  
Registration Division (7505C)

*Bruce F. Kitchens*  
*31 Jan 2005*

*SBR*  
*02-02-05*

**INTRODUCTION:**

This product is in joint review with PMRA-Canada. The registrant, BASF Corporation, is responding to an Agency letter dated 13 Jan 2004 for the proposed end-use product, BAS 670 336SC Herbicide. In the Agency letter, product chemistry deficiencies were detailed. In this instance, the storage stability and corrosion characteristics of the product were reported without supporting data. In response, the registrant indicates that a two-year GLP study of the storage stability of the end-use product has been completed which shows the product to be stable. With this submission, the Technical Review Branch (TRB) is asked to determine the status of the storage stability and corrosion characteristics data requirements and the status of the applicable product chemistry data requirements for this product registration.

**SUMMARY OF FINDINGS:**

TRB has reviewed this submission and reports the following findings:

1. The Agency completed a review of the product's storage stability and corrosion characteristics on 09 Nov 2004 (DP Barcode D305002 & MRID# 462427-07).
2. All applicable product chemistry data requirements are satisfied.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

1. The storage stability (830-6317) and corrosion characteristics (830-6320) data requirements are satisfied. This determination was reached in the TRB memo dated 09 Nov 2004 (DP Barcode D305002 & MRID# 462427-07). The product is stable when stored at 25°C for a one year period in its commercial packaging material of HDPE.
2. The proposed basic CSF dated 05 Feb 2003 for this product was determined to be not acceptable (DP Barcode: D290069 29 Sept 2003). The proposed product contains two inert ingredients which are not cleared for use in formulated pesticide products. See confidential appendix for details.
3. With the completion of this review, TRB has determined that all applicable product chemistry data requirements as specified in 40 CFR 158.150 through 158.190 are satisfied.

5

## CONFIDENTIAL APPENDIX

EP  MP  PRODUCT CHEMISTRY REVIEW

BARCODE No.: D304583 REG./File Symbol No.: 7969-ENL

PRODUCT NAME: BAS 670 336SC Herbicide

Reviewer: BKitchens Company: BASF Corporation

1. The inert ingredients, [REDACTED] and [REDACTED] are not cleared for use in formulated pesticide products. Inform the registrant that the following information must be submitted by the supplier to the Agency:
- ▶ Composition with chemical names
  - ▶ CAS Reg. No.
  - ▶ % of ingredients, if mixture percentages must add up to 100%