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

JUN 25 1986

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Response to Pendimethalin Registration  
Standard by American Cyanamid Company  
Accession No. 260473 dated November 19, 1983  
(RCB No. 790)

FROM: Gobind P. Makhijani, Chemist *G. Makhijani*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

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

and

Amy Rispin  
Science Integration Staff  
Hazard Evaluation Division (TS-769C)

THUR: Charles L. Trichilo, Chief  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *CLT*

In response to the Pendimethalin Registration Guidance document dated March 29, 1985, American Cyanamid Company has submitted additional product chemistry data entitled "Part II, Section 61-3, Discussion of the Formation of Impurities for the Manufacturing-Use Product on Technical Prowl Herbicide - Potential Nitrosamines in Pendimethalin," dated November 19, 1985 (EPA Accession Number 260473).

These data and our conclusions are discussed in the attached confidential Appendix A.

Part I of the discussion on impurity formation as well as additional data on nitrosamine content and descriptions of analytical methods were submitted previously (Accession Number 260401, dated Nov. 6, 1985). See the 6/13/86 G. Makhijani memo for details. We reiterate our conclusion from that memo that no additional information is required under Section 61-3.

We defer to the Toxicology Branch regarding the toxicological significance of the possible nitrosamines impurities found during the manufacture and storage of pendimethalin. A copy of the original submission is available in Residue Chemistry Branch (RCB).

Attachment: Confidential Appendix A (2 pages)

cc: Pendimethalin Registration Standard, S.F, Reviewer,  
RBP, PMSD/ISB (E. Eldridge), Taylor (PM 25), TOX (Coberly)

cc: Pendimethalin Registration Standard, R.F, Reviewer,  
PMSD/ISB (E. Eldridge), S.F, Taylor (PM 25), Circulation,  
RBP, TOX (Coberly)

Pendimethalin dietary exposure review

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Pages 3 through 4 are not included in this copy.

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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 product 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
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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.

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