

DATE OUT: 08/29/06

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP EP

DP BARCODE No.: D328452 REG. No. /File Symbol No. 67690-UE

PRODUCT NAME: RENOVATE GRANULAR

PCC: 116002

Decision No. 366122

FOOD USE

COMPANY: SEPRO CORP

FROM:

Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505P)

SFB
8/30/06

TO:

Toby-Colvin/Snyder PM 25
Herbicide Branch/ RD (7505P)

INTRODUCTION:

SEPRO CORP. is seeking registration for the subject product RENOVATE GRANULAR that contains ingredients. Applicant has submitted a Basic CSF dated 03/17/06. The submitted package was reviewed and details will be discussed below:

SUMMARY OF FINDINGS

1. The subject product RENOVATE GRANULAR contains 14.0% Triclopyr: 3, 5, 6-trichloro-2 pyridinyloxyacetic acid, triethylamine salt.
2. SEPRO CORP. has submitted (MRID # 467919-01,-02) for Product Chemistry data to support the registration of RENOVATE GRANULAR.
3. The sources of active ingredients are registered.
4. The inerts used are cleared for the proposed use.
5. Basic CSF dated 03/17/06 meets the label claim of 14.0% Triclopyr and is acceptable.
6. Data corresponding to the guideline reference 830.1800 (Enforcement of Analytical Method) satisfy the data requirements of 40CFR§158.180. HPLC Method with UV@ 285 nm was used for analysis of active ingredient.

Data corresponding Sub Group A completely satisfy the data requirements of 40CFR§ 58.155 to §158.180.

7. One year Storage Stability (830.6317) and Corrosion Characteristics, (830.6320) studies are a requirement for the formulated product .
The registrant is required to generate one year storage stability (830.6317) study for the proposed product under warehouse conditions. It is recommended that observations are made at 0, 3, 6, 9, and 12 months intervals. The corrosion Characteristics (830.6320) study may be carried out concurrently.
The registrant may request the PM for conditional registration while the study is in progress.
8. Data corresponding to the Sub Group B satisfy the data requirements of 40CFR §158.190.

CONCLUSIONS:

TRB has reviewed the product chemistry data submitted for the above mentioned subject product and has concluded that:

1. The subject product RENOVATE GRANULAR contains 14.0% Triclopyr.
2. The label claim is in compliance with PR Notice 91-2.
3. The Basic CSF dated 03/17/06 is acceptable.
4. The product chemistry data requirements for series 830 Subgroup A and B have been satisfied except finding #7.

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<u>PRODUCT CHEMISTRY DATA</u> (SERIES 830 Subgroup A & Subgroup B)Subgroup A	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830.1550. Chemical Identity (Basic CSF)	Y	03/17/06
830.1600. Beginning Materials	Y	467919-01
30.1650. Formulation Process	Y	467919-01
830.1670. Discussion of Impurities	Y	467919-01
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits (Basic CSF)	Y	03/17/06
830.1800. Enforcement Analytical Method	Y	467919-01

<u>Subgroup B</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitat. Descrip.</u>	<u>MRID No.</u>
830.6302. Color	N	Light tan to cream	467919-02
830.6303. Physical State	Y	Granular solid	467919-02
830.6304. Odor	Y	Characteristic of overripe fruit	467919-02
830.6314. Oxidation/Reduction Action	NA	Compatible with turpentine, Zn, MAP & KMnO4. No significant oxidizing or reducing action.	467919-02
830.6315. Flammability	NA	NA	467919-02
830.6316. Explodability	NA	Product is not potentially explosive	467919-02
830.6317. Storage stability	N	N	
830.6319. Miscibility	NA	NA	467919-02
830.6320. Corrosion Characteristics	N	N	
830.6321 Dielec. Bkd. Vltg.	NA	not intended for use around electric equipment	467919-02
830.7000. pH	Y	7.81 ± 0.07 @ 20.5°C ± 0.2	467919-02
830.7100. Viscosity	NA	NA	467919-02
830.7300. Density/Bulk Density	Y	Pour density 0.676 ± 0.007g/ml , tap density 0.715 ± 0.011g/ml	467919-02

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.