

DATE OUT: 14 Jan 1998

SUBJECT: EP MP PRODUCT CHEMISTRY REVIEW
DP BARCODE No.: D239212
REG./File Symbol No.: 59639-RNE
PRODUCT NAME: Select Super Herbicide
COMPANY: Valent U.S.A. Corporation

TO: PM # 23, Joanne Miller/Daniel Kenny
Insecticide Branch
Registration Division (7505C)

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

Bruce F. Kitchens 14 Jan 1998

INTRODUCTION:

The registrant, Valent U.S.A. Corporation, is submitting an application for the registration of the proposed end-use product, Select Super Herbicide. Select Super Herbicide is a food use chemical which contains the active ingredient, clethodim. In support of this proposed registration, the registrant has submitted a proposed label, a Confidential Statement of Formula (CSF) dated 05 Aug 1997, and product chemistry data (MRID # 443603-7). The Technical Review Branch (TRB) has been asked to review this submission and determine its acceptability.

SUMMARY OF FINDINGS:

TRB has reviewed this submission and reports the following findings:

- > All inert ingredients are cleared for use in formulated products and are exempt from tolerances.
- > Certified limits as proposed are acceptable.
- > The proposed label's ingredient statement and the CSF contain the same nominal concentration.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

- > This submission meets the data requirements as specified in 40 CFR 158.155, 158.160, 158.162, 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 production process, description of formulation process, discussion of formation of impurities, certified limits, and the enforcement analytical method.
- > This submission also satisfies the data requirements as specified in 40 CFR 158.190 with respect to physical and chemical properties.

EP [x] MP [] PRODUCT CHEMISTRY REVIEW

- 1. DP BARCODE No.: D239212 2. REG./File Symbol No.: 59639-RNE
- 3. Registration [x] 4. Reregistration [], Rereg Case No. _____
- 5. Product Name: SELECT SUPER HERBICIDE
- 6. Pesticide Type: Fungicide [] Herbicide [x]
 Insecticide [] Rodenticide [] Antimicrobial []
 Plant Growth Regulator [] Others: _____
- 7. Uses: Food [x] Non food use []
- 8. Type of Submission: New [x] Resubmission [] Amendment []
 "ME-TOO" [] Alternate Formulation [] Repack []
 Experimental Use Permit [] Other (Specify) _____
- 9. If "Me-TOO" Registration, this product is [] is not []
 similar or substantially similar to EPA's Reg. No.: _____,

If not, comment in Confidential Appendix A on the differences between the registered and the new source where significant.

CONFIDENTIAL STATEMENT OF FORMULA, DATED 05 Aug 1997 :

- 10. Type of formulation and the sources of active ingredients:
 - a. Non-integrated formulation system..... [x]
 - b. Are all technical grade active ingredients used registered? yes [x] no []
 - c. Integrated formulation system..... []

11. Composition: The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

Active ingredient(s)	NC	% by weight	
		UCL	LCL
Clethodim tech. (93.4%)	13.2	13.9	12.5

12. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:

yes no

13. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:

yes no

14. Clearance of intentionally added ingredients in the formulation for the intended use:

- a. Formulation intended for food use under 40CFR§180.1001:

yes no Some are cleared, others are not

Cleared under list: c d e

- b. Formulation intended for non-food use:

yes no Some are cleared, others are not

15. For products produced by an integrated formulation system:
All impurities of toxicological significance have an UCL:

yes no not applicable

All other impurities 0.1% associated with the active ingredient in the product are reported at their nominal concentrations:

yes no not applicable

PRODUCT LABEL, EPA RECEIVED (draft) :

16. The active ingredients statement (chemical identities, nominal concentrations) is consistent with the CSF yes no
17. The formulation contains one of the following:
- | | | |
|--|---|--|
| 10% or more of a petroleum distillate: | yes <input checked="" type="checkbox"/> | no <input type="checkbox"/> |
| 1% or more of methyl alcohol: | yes <input type="checkbox"/> | no <input checked="" type="checkbox"/> |
| sodium nitrite at any level: | yes <input type="checkbox"/> | no <input checked="" type="checkbox"/> |
| a toxic List 1 inert at any level: | yes <input type="checkbox"/> | no <input checked="" type="checkbox"/> |
| arsenic in any form: | yes <input type="checkbox"/> | no <input checked="" type="checkbox"/> |
18. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?
- yes no not applicable
19. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:
- yes no not applicable
20. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses:
- yes no

PRODUCT CHEMISTRY DATA (GROUP A)

<u>21. Chemical IDs/Manufacture/ Analytical Information</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830-1550 Chemical Identity	Y	443603-07
830-1600 Description of Materials Used to Produce the Product	Y	"
830-1620 Description of Production Process	Y	"
830-1650 Description of Formulation Process	Y	"
830-1670 Discussion of Impurities	Y	"
830-1700 Preliminary Analysis	N/R	
830-1750 Certified Limits	Y	"
830-1800 Enforcement Analytical Method	Y	"

PRODUCT CHEMISTRY DATA (GROUP B)

<u>24. Physical/Chemical Properties</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitative Description</u>	<u>MRID No.</u>
830-6303 Physical State	Y	liquid	443603-07
830-6304 Odor	Y	aromatic-like	"
830-7300 Density/Bulk Density	Y	0.9301 g/ml @ 21.4°C	"
830-7000 pH	Y	3.2 @ 22°C	"
830-6313 Stability to Sunlight, Normal and Elevated Temperature, Metals, and Metal Ions	N/R		
830-6315 Flammability-Flash Point	Y	80°C	"
830-6302 Color	Y	amber	"
830-6316 Explodability	N/A		
830-6317 Storage Stability	Y	TM-5403 is stable for 2 weeks at 54°C. The percent degradation of a.i. found to be 3.7% after 14 days at 54°C. This accelerated stability data can be extrapolated to two yrs. at room temp. Two yr. study at 25°C in progress.	"
830-7100 Viscosity	Y	8.90 cps @ 20°C	"
830-7200 Melting Point	N/R		
830-7220 Boiling Point	N/R		

830-6319 Miscibility (With Hydrocarbon solvents)	N/A		
830-6320 Corrosion Characteristics	Y	TM-5403 found to be corrosive to Cu with an avg. Corrosion rate of 0.3111 ± 0.006 mm/y. Little or no corrosion was detected for stainless steel, Al, and polyethylene.	"
830-6321 Dielectric Breakdown Voltage	N/A		

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.

8