

SUBJECT: Product Chemistry Review of Clethodim Technical

(2-24-97)

TO: Daniel Kenny, PM Team 23
Fungicide-Herbicide Branch/RD (7505C)

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FEB 24 1997

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HP
2/24/97

REGISTRANT: Valent U.S.A. Corporation

DP BARCODE: D232801

EPA ID NO: 59639-2

CHEMICAL NAME: (E)-2(1-[[3-Chloro-2-propenyl)oxy]imino]propyl)-
5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-
one; (Clethodim)

PCC NO: 121011

USE: Herbicide

Introduction

The Registrant proposes to change the Basic Formulation of Clethodim Technical to reflect an increase in the purity of the active ingredient. Additionally, the Registrant proposes to change the Label ingredient statement to reflect the change in the Nominal Concentration of the active ingredient. Product chemistry information which is submitted in support of these changes is discussed below.

61-1: Product Identity and Disclosure of Ingredients

The identity and composition of the Technical Grade of the Active Ingredient (TGAI), Clethodim Technical, is reported in the Confidential Statement of Formula (CSF, EPA Form 8570-4, dated December 3, 1996). The CSF is reproduced in the Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.155. No additional information is needed.

62-1: Preliminary Analysis

The Registrant has analysed samples of 15 batches of the TGAI for the active ingredient clethodim and its impurities. The results of the analyses are discussed in the Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.170. No additional information is needed.

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62-2: Certified Limits

The Confidential Statement of Formula contains the certified limits of the components of the TGAI and is discussed in the Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.175. No additional information is needed.

SUMMARY

The information submitted satisfies the product chemistry requirements for the proposed changes in the concentration of the active ingredient. The Nominal Concentration for the active ingredient accurately represents the analytical results of the analyses.

PCRS/RSB concludes that the information submitted supports the proposed changes, and the proposed changes are acceptable.

ATTACHMENT: Confidential Appendix

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Pages 203 through 204 are not included in this copy.

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 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.

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.
