

DATE OUT: 11/07/2001

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]
DP BARCODE No.:D278196 REG./File Symbol No.:100-895
Updated Basic CSF for Abamectin Technical with greater Purity.

PRODUCT NAME: AFFIRM TECHNICAL

FROM:

Indira Gairola 11/07/01
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Product Chemistry Team
Technical Review Branch/RD (7505C)

TO:

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Insecticide Branch/RD(7505C)

INTRODUCTION:

SYNGENTA CROP PROTECTION, INC has submitted updated basic CSF(08/31/01) and enforcement analytical Methods of analyses for greater concentration of active ingredient in the technical source. Details are mentioned below.

SUMMARY OF FINDINGS:

1. SYNGENTA CROP PROTECTION, INC. has upgraded basic CSF (08/31/01) by increasing the concentration of active ingredient Abamectin from 85.0% to 90.0%,
2. SYNGENTA has omitted "Related compounds" with no determined active status and added their percentage into Other Ingredients which has been changed to 10.0%
3. Mass Spectrometry and liquid chromatography were used as Analytical Methods of analysis.
4. The updated basic CSF (08/31/01) is unacceptable on account of the following reasons:
 - a) There is too much of variation between the upper and lower certified limits and the nominal concentration. The

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certified limits of Abamectin technical are not within the standard limits as per 40CFR§158.175. These limits should be $\pm 5\%$ of the nominal concentration.

- b) The remaining certified limits where applicable need to be corrected likewise.
 - c) In order to have correct understanding NOA-422601 (Avermectin Ba) and NOA-421704 (Avermectin Aa) should be linked together
 - d) Likewise NOA-422601 should be linked with NOA-421704 in order to determine correct purity.
5. On account of the aforementioned reasons TRB cannot accept The CSF dated (08/31/01).

CONCLUSIONS:

TRB has reviewed the aforementioned request concludes :

1. The proposed updated CSF (08/31/01) cannot be accepted on account of the reasons mentioned in the Summary of findings.
2. If the applicant wishes this to be considered applicant must comply with items No4 a, b, c and d, as stated in the summary of findings.