Memorandum

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Through: Linda Propst, Chief
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Subject: Review of Product Chemistry generic data requirement
Guideline 830-7050 (UV/Visible Absorption). DP# 313099.

INTRODUCTION

The registrant Bayer Cropscience LP, submitted the product chemistry data in 464213-01 to fulfill the generic data requirement for reregistration of Asulam Sodium Technical, EPA Reg. # 264-505.

1. Sample Preparation:
   The stock solution was prepared by dissolving 10.15 mg of Asulam Na salt in 10 ml of methanol.
   A. Acid medium: 2 ml of stock solution was added to 10 ml of HCl(1N) and the volume was brought to 100 ml with methanol.
   B. Neutral medium: 1 ml of stock solution was added to 10 ml of deionized water, and the volume was brought to 100 ml with methanol.
   C. Basic medium: 1 ml of stock solution was added to 10 ml of NaOH (1N) solution and The volume was brought to 100 ml with methanol.

2. Instrument:
   An UV-Visible double beam spectrometer(Hitachi Model U-3000) with a wavelength range190-9000 nm was used. Accuracy ± 0.5 nm.

3. Calculation:

$\varepsilon = A \div [Ci \times d]$
ε = molar extinction coefficient in $1 \times mol^{-1} \times cm^{-1}$.
Ci = concentration of the test substance in $mol \times 1^{-1}$.
A = absorbance at a given wavelength.
d = path length in cm.

4. Results:

wavelength nm	Concentration $mol \times l^{-1}$	Maximum Absorbance	ε $1 \times mol^{-1} \times cm^{-1}$
201.4 (acidic)	8.04×10^{-5}	1.0805	13439
201.8 (neutral)	4.02×10^{-5}	0.9202	22891
259.2 (basic)	4.02×10^{-5}	0.6708	16687

5. Conclusion:

The submitted data fulfill the generic data requirement of the Guideline 830-7050 (UV-Visible Absorption) for reregistration of Asulam Sodium Technical, EPA Reg. # 264-505.

Reference:

MRID # 464213-01: D.. Just; G. Turier; N. Zinini; and J. L Guesnet, 1998, Asulam Na salt-NMR, IR, MS, and UV-Visible Spectra. Performing Laboratory: Rhone-Poulenc Agro Centre De Recherche De La Dargoire, 14-20 RUE Pierre Baizet, 69009 Lyon (France) pp 25.