

US EPA ARCHIVE DOCUMENT



NAFTA Technical Working Group on Pesticides
Grupo de Trabajo Técnico del TLCAN sobre Plaguicidas
Le groupe de travail technique de l'ALENA sur les pesticides

Biopesticides Registration Improvement Course

Biochemical Pesticides Product Chemistry



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Office of Pesticide Programs

Biopesticides and Pollution Prevention Division



What are these Chemicals?





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Overview for Biochemical Product Chemistry

40 CFR Pertinent Sections

§ 152.43 **Alternate Formulations**

§ 158.300 **Product Chemistry Definitions**

§ 158.350 **Certified Limits**

§158.2030 **Biochemical Pesticide Product
Chemistry Data Requirements**



Overview for Biochemical Product Chemistry

Guideline Number	Data Requirement	All Use Patterns	Test Substance		Test Notes
			MP	EP	
Product Identity and Composition					
880.1100	Product identity and composition	R	TGAI, MP	TGAI, EP	1, 2
880.1200	Description of starting materials, production and formulation process	R	TGAI, MP	TGAI, EP	2, 3
880.1400	Discussion of formation of impurities	R	TGAI and MP	TGAI and EP	4



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880.1400	Discussion of formation of impurities	R	TGAI and MP	TGAI and EP	4
830.1700	Preliminary Analysis	CR	TGAI and MP	TGAI and EP	5, 8



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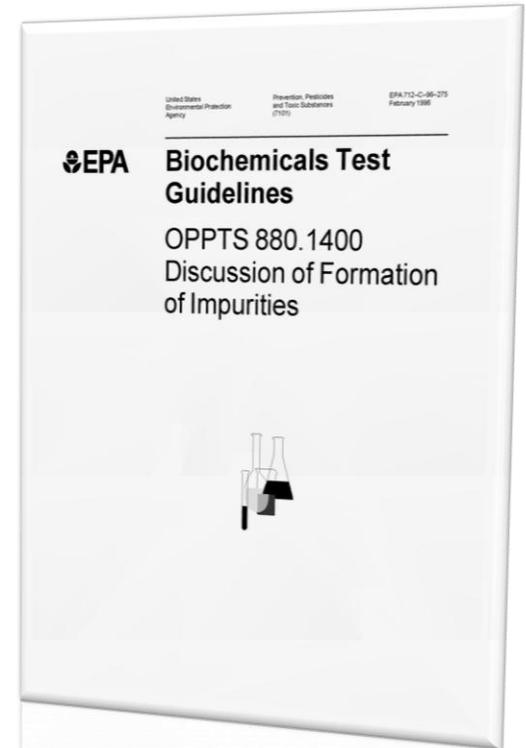
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Resources for Product Chemistry

Online CFR

Guidelines

- Series 830: [Product Properties](#)
- Series 880: [Biochemicals](#)





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Commonly Seen Problems / Issues

Integrated vs. Non-integrated Systems

&

Substantially Similar Products



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Commonly Seen Problems / Issues

Using Agency Guidance for Certified Limits

If the nominal concentration (N) for the ingredient and percentage by weight for the ingredient is:	The certified limits for that ingredient will be as follows:	
	Upper Limit	Lower Limit
$N \leq 1.0\%$	$N + 10\%N$	$N - 10\%N$
$1.0\% \leq N \leq 20.0\%$	$N + 5\%N$	$N - 5\%N$
$20.0\% \leq N \leq 100.0\%$	$N + 3\%N$	$N - 3\%N$

Taken from 40 CFR §158.350



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Commonly Seen Problems / Issues

Inert Ingredients/Inert Mixtures



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Commonly Seen Problems / Issues

Using the Test Notes

Guideline Number	Data Requirement	All Use Patterns	Test Substance		Test Notes
			MP	EP	
830.6315	Flammability	CR	MP	EP	9
830.6317	Storage stability	R	MP	EP	--

9. Required if the product contains combustible liquids.



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Commonly Seen Problems / Issues

Units

How hot is it outside?

100