

US EPA ARCHIVE DOCUMENT



CONFIDENTIAL

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

received

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MAR 25 1988

MEMORANDUM

SUBJECT: Methyl Parathion MP - EPA Registration No. 4787-4  
Cheminova-Response to the Product Chemistry  
Chapter - MRID No. 404824-01, Dated January 20,  
1987 - RCB No. 3280.

FROM: Gobind P. Makhijani, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *Gobind Makhijani*

TO: Dennis H. Edwards, Jr., PM 12  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

and

Amy S. Rispin, Ph.D., Chief  
Science Integration Staff  
Hazard Evaluation Division (TS-769C)

THRU: William J. Boodee, Section Head  
Reregistration Section  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *WJ*

In response to the Methyl Parathion Registration Guidance Document (issued December 15, 1986), A/S Cheminova of Lemvig, Denmark has submitted additional product chemistry data (dated January 11, 1988, MRID No. 404824-01) for their methyl parathion manufacturing-use product (MP) (EPA Registration No. 4784-4).

These data and our conclusions are described below. Also revised Tables A and B are provided at the end of this report.

62-1 - Preliminary Analysis

The registrant has provided (MRID No. 404824-01) preliminary analyses of five batches of methyl parathion MP produced in 1987. The results of the preliminary analyses of these five batches are discussed in Confidential Appendix A.

No further information is needed for this topic.

62-2 - Certification of Limits

The registrant has submitted the required information (dated December 1, 1987) giving the lower and upper certified limits for the active ingredient, and upper limits for the impurities in their MP. These limits are discussed in Confidential Appendix A. However this information must be submitted on EPA Form 8570-4 (Rev. 02-85).

On receipt of the correctly completed form, this data gap will be considered fulfilled.

62-3 - Analytical Methods to Verify Certified Limits

The registrant has submitted analytical methods for the determination of active ingredients and other impurities in the MP (MRID No. 404824-01). However, no representative chromatograms have been submitted for any of these methods. Upon receipt of the representative chromatograms, this data gap will be considered fulfilled.

All the analytical methods have been validated by the registrant for precision and accuracy and no further information is required on this subtopic.

Attachment I: Tables A and B (4 pages)

cc: Methyl Parathion Registration Standard, S.F., Reviewer  
RBP, PMSD/ISB (E. Eldredge), D. Edwards (PM 12) TOX  
(Coberly)

Attachment II: Confidential Appendices A & B (4 pages)

cc: Methyl Parathion Registration Standard, S.F., Reviewer  
RBP, PMSD/ISB (E. Eldredge), D. Edwards (PM 12), TOX  
(Coberly)

cc: Methyl Parathion Registration Standard, S.F., R.F.,  
Reviewer, PMSD/ISB (E. Eldredge), D. Edwards (PM 12)  
Circu, RBP, TOX (Coberly).

TABLE A  
 GENERIC DATA REQUIREMENTS FOR METHYL PARATHION TECHNICAL<sup>a</sup>

Guideline Citation and Name of Test	Test Substance <sup>1/</sup>	Guidelines Status	Are Data Required?		Reference
			[Yes]	[No]	
<u>§158.120 Product Chemistry</u>					
<u>Product Identity:</u>					
61-1 - Product Identity and Disclosure of Ingredients	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404824-01
61-2 - Description of Beginning Materials and Manufacturing Process	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D Nos. 00055866, 00055859, 404066-01
61-3 - Discussion of Formation of Impurities	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 00055859
<u>Analysis and Certification of Product Ingredients</u>					
62-1 - Preliminary Analysis	TGAI	CR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404824-01
<u>Physical and Chemical Characteristics</u>					
63-2 - Color	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404066-01
63-2 - Physical State	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404066-01
63-4 - Odor	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404066-01
63-5 - Melting Point	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404066-01
63-6 - Boiling Point	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRI D No. 404066-01

<sup>a</sup>The unregistered technical is used to produce A/S Chemi nova's 80% formulation intermediate (or MP) EPA Registration No. 4787-4.

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TABLE A  
 GENERIC DATA REQUIREMENTS FOR METHYL PARATHION TECHNICAL

Guideline Citation and Name of Test	Test Substance <sup>1/</sup>	Guidelines Status	Are Data Required?		Reference
			[Yes]	[No]	
<u>\$158.120 Product Chemistry (cont'd)</u>					
<u>Physical and Chemical Characteristics (cont'd)</u>					
63-7 - Density, Bulk Density, or Specific Gravity	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-8 - Solubility	TGAI or PAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-9 - Vapor Pressure	PAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 00055860
63-10 - Preliminary Analysis	PAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-11 - Octanol/Water Partition Coefficient	PAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 00055860
63-12 - pH	TGAI	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-13 - Stability	TGAI	R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>Other Requirements:</u>					
64-1 - Submittal of samples	TGAI, PAI	CR	<input type="checkbox"/>	<input checked="" type="checkbox"/> <sup>2/</sup>	

1/ TGAI = Technical Grade of the Active Ingredient; PAI - Pure Active Ingredient; R = Required;  
 CR = Conditionally Required.  
 2/ If samples are needed, the Agency will request them.

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TABLE B  
 PRODUCT-SPECIFIC DATA REQUIREMENTS FOR MANUFACTURING-USE PRODUCTS CONTAINING METHYL PARATHION (Chemi.nova)  
 EPA Registration No. 4784-4

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			[Yes]	[No]	
<u>\$158.120 Product Chemistry</u>					
<u>Product Identity:</u>					
61-1 - Product Identity and Disclosure of Ingredients	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404824-01
61-2 - Description of Beginning Materials and Manufacturing Process	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID Nos. 00055866, 00055859, 404066-01
61-3 - Discussion of Formation of Impurities	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 00055859
<u>Analysis and Certification of Product Ingredients</u>					
62-1 - Preliminary Analysis	MP	CR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404824-01
62-2 - Certification of Limits	MP	R	<input checked="" type="checkbox"/> 1/	<input type="checkbox"/>	MRID No. 404824-01
62-3 - Analytical Methods to Verify Certified Limit	MP	R	<input checked="" type="checkbox"/> 2/	<input type="checkbox"/>	MRID No. 404824-01
<u>Physical and Chemical Characteristics</u>					
63-2 - Color	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-2 - Physical State	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01
63-4 - Odor	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404066-01

1/ Certification of Limits should be submitted on Form 8570 (Rev. 2-85).  
 2/ Representative chromatograms for the various methods should be submitted.

TABLE B  
 PRODUCT SPECIFIC DATA REQUIREMENTS FOR MANUFACTURING-USE PRODUCTS CONTAINING METHYL PARATHION (Chemirova)  
 EPA Registration No. 4784-4

Guideline Citation and Name of Test	Test Substance <sup>1/</sup>	Guidelines Status <sup>2/</sup>	Are Data Required?		Reference
			[Yes]	[No]	
<u>§158.120 Product Chemistry (cont'd)</u>					
<u>Physical and Chemical Characteristics (cont'd)</u>					
63-7 - Density, Bulk Density, or Specific Gravity	MP	R	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MRID No. 404824-01
63-12 - pH	MP	CR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-14 - Oxidizing or Reducing Action	MP	CR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-15 - Flammability	MP	CR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-16 - Explodability	MP	R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-17 - Storage Stability	MP	R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-18 - Viscosity	MP	R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-19 - Miscibility	MP	CR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
63-20 - Corrosion Characteristics	MP	R	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>Other Requirements:</u>					
64-1 - Submittal of samples	MP	CR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<sup>3/</sup>

1/ MP = Manufacturing-Use Product.  
 2/ R = Required; CR = Conditionally Required.  
 3/ If samples are needed, the Agency will request them.

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Pages 7 through 10 are not included in this copy.

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The material not included contains the following type of information:

Identity of product inert ingredients.

\_\_\_\_\_ Identity of product inert 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.

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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.

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