

US EPA ARCHIVE DOCUMENT

69526-5

DATE: 22/MAR/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Manufacturing-Use [ ] End-Use Product [X]  
DP BARCODE No.D:263043 EPA RECEIVED DATE:09/DEC/1999 REG./File Symbol No.:69526-L  
PRODUCT NAME: Spray Oil 10E, 98% Spray Oil MRID.:None  
COMPANY NAME: Petro-Canada Action Code:166

FROM: Sami Malak, Chemist *Sami Malak*  
Technical Review Branch/RD (7505C)

TO: 04 Tina Levine/Akiva Abramovitch  
Insecticide-Rodenticide Branch/RD (7505C)

**INTRODUCTION:**

This is re-review of a previous memorandum to consider additional data that was submitted since our previous memorandum (same tracking sheet of D263043, S. Malak, 16/MAR/2000). In our previous memorandum, a request was made for submission of all product chemistry data requirements. Previously, in a letter dated 11/JAN/2000, the applicant requested a FIFRA Section 3(c)(7) conditional registration of subject product. In support of this action, the applicant included product's label, EPA received 09/DEC/1999, CSFs, a basic and two alternate formulations, identified by this reviewer as Alt A & B, all dated 01/DEC/1999, and summary of the physical/chemical properties on EPA Form 8570-36 in compliance with PR Notice 98-1.

**FINDINGS:**

1. The subject product is produced by a non-integrated formulation system, meaning that the technical source is registered. The product contains 98% petroleum distillates, Reg. No. Reg. No. 69526-4.
- 2a. The applicant complied with PR Notice 98-1 and submitted a summary of the physical/chemical properties on EPA Form 8570-36. A signed and dated (12/JAN/2000) self-certification statement, EPA Form 8570-37, was also included. Summary of the physical/chemical properties on EPA Form 8570-36 is adequate and is appended to this memorandum (one page).
- 2b. The applicant should be advised to conduct a minimum of one year storage stability study as per the regulations of Guideline #830-6317 to be submitted if requested as per the regulations of PR Notice 92-5.
- 2c.- Adequate analytical methods are available for enforcement. The methods were previously submitted and reviewed in connection with registration of the technical source, spray oil 22, Reg. No. 69526-4.
- 2d. The applicant has satisfied product chemistry data requirements for registration of subject

product.

3. The label claim nominal concentration of 98% petroleum distillates is consistent with that on the CSF, both are in compliance with the regulations of PR Notice 91-2. Further, the storage and disposal statement is in compliance with the regulations of 40CFR§156.10. No physical or chemical hazards are anticipated from the subject product.
4. The submitted product's CSFs a basic and two alternate formulations, identified by this reviewer as Alt A & B, all dated 01/DEC/1999, were filled out correctly and completely as per the regulations of PR Notice 91-2. Further, the upper and lower certified limits are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations intended for food uses.

### **CONCLUSIONS:**

We have no objections for a FIFRA Section 3(c)(5) unconditional registration of subject product.

### **REVIEW OF PRODUCT CHEMISTRY DATA:**

1. A statement of data confidentiality dated 01/DEC/1999 was included with this submission claiming confidentiality of some of the data requirements on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C).
2. A GLP statement dated 01/DEC/1999 was included with this submission to the effect that some of the submitted studies were conducted in compliance with GLP requirements of 40CFR§160.

### **DATA SUBMITTED**

**Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)**

#### **830-1550 Product Identity and Composition**

This product contains one registered technical grade of active ingredient plus cleared inert ingredients (refer to product's CSF dated 01/DEC/1999).

#### **830-1800 Enforcement Analytical Method:**

Adequate analytical methods are available for enforcement. The methods were previously submitted and reviewed in connection with registration of the technical source, spray oil 22, Reg. No. 69526-4.

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**Group B, Series 830-Physical and Chemical Properties (40 CFR 158.190):**

The applicant complied with PR Notice 98-1 and submitted a summary of the physical/chemical properties on EPA Form 8570-36. A signed and dated (12/JAN/2000) self-certification statement, EPA Form 8570-37, was also included. Summary of the physical/chemical properties on EPA Form 8570-36 is adequate and is appended to this memorandum (one page).

**830-1600 Description of Materials Used to Produce the Product:**

One registered technical grade of active ingredient plus cleared inert ingredients (refer to product's CSF dated 01/DEC/1999).

**830-1650 Description of Formulation Process:**

This product was formulated using a mixture of one registered technical grade of one active ingredient plus cleared inert ingredients (refer to product's CSF dated 01/DEC/1999).

**830-1670 Discussion of Formation of Impurities:**

The applicant reported no impurities  $\geq 0.1\%$  by weight were known to be formed during formulation and storage of the product.

**830-1700 Preliminary Analysis:**

Not required for non-integrated products.

**830-1750 Certified Limits:**

The applicant reported the same ingredients at percentages and low/upper limits as those reported on product's CSF.





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
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**SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)**

1. PRODUCT NAME: Spray Oil 22E - product contains [REDACTED]		2. Reg. No. 69526-J
3. COMPANY NAME: Petro Canada Lubricants		4. SUBMISSION DATE: Jan 12, 2000
5. FIRST SUBMISSION [ ] 6. RESUBMISSION [X]	7. PESTICIDE TYPE: pesticide / miticide	10. REGISTRATION [X]
8. FORMULATED MANUFACTURING-USE PRODUCT [ ] or 9. END-USE PRODUCT [X]		11. REREGISTRATION [ ]
13. PRODUCT MANAGER OR CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN): Sami Malak		12. REREG CASE #
14. GUIDELINE REFERENCE NO. (GRN/TITLE)	15. VALUE or QUALITATIVE DESCRIPTION/METHOD(s) USED WHERE APPLICABLE AND REFERENCES	16. MRID or REPORT NO.

**Group B, Series 830-Physical and Chemical Properties (40 CFR 158.190)**

-6302	Color	Water White	PCL-01
-6303	Physical State	Liquid @ 20C	PCL-01
-6304	Odor	No Discernible Odor	PCL-01
-6314	Oxidation/Reduction: Chemical Incompatibility	No reaction when sample was tested against Zinc Powder. Sample dissolved in gasoline and formed distinct layer when mixed with MAP, commercial bleach, and tap water.	PCL-01
-6315	Flammability/Flame Extension	The sample did not flash up to 220F	PCL-01
-6316	Explosibility	In DARTEC Inc's opinion, the sample contains no potentially explosive components	PCL-01
-6317	Storage Stability	No change in concentrations based on FTIR spectra between initial and 1 month periods when stored at ambient warehouse conditions in white HDPE containers. Also, only minor changes in viscosity and density were observed	PCL-01
-6319	Miscibility	Not applicable. Product is not an emulsifiable liquid to be diluted with oil or non polar solvents.	PLC-01
-6320	Corrosion Characteristics	Aluminum: +0.0098 mils/year; Carbon Steel: +0.0135 mils/year; Stainless Steel: +0.0135 mils/year. High density polypropylene : +4.1504 mils/year (+ = gain)	PLC-01
-6321	Dielectric Breakdown Voltage	Not applicable. Product is not labeled for use around electrical equipment.	PLC-01
-7000	pH	The pH is 4.95 (1% v/v aqueous mixture) @20C.	PLC-01
-7100	Viscosity	Visc@20C, 2.5 RPM / 5.0 RPM / 10 RPM Initial 49.7 / 49.051 / 48.7; 1 Month 49.6 / 49.4 / 49.2	PLC-01
-7300	Density/Relative Density/ Bulk Density	Initial density - 0.8528 g/ml; One month 0.8524 g/ml	PLC-01