DATE OUT: July 17, 1997

SUBJECT: EP [x] MP [ ] PRODUCT CHEMISTRY REVIEW
DP BARCODE No.: D231040 REG./File Symbol No.: 499-GIL
PRODUCT NAME: Whitmire PT 239 Tri Die Insecticide
COMPANY: 

TO: Linda Arrington, PM Team 13
Insecticide Branch/RD (7505C)

FROM: Alfred Smith, Chemist
Technical Review Branch/RD (7505C)

SUMMARY OF FINDINGS:
The Applicant proposes the registration of the End-Use Product (EP), Whitmire PT 239 Tri Die Insecticide. Product chemistry studies, Labelling, and a revised Confidential Statement of Formula (CSF, EPA Form 8570-4, dated 10/11/96) are submitted in support of the registration.

The product chemistry studies satisfy the requirements of 40 CFR 158.155 - 158.190. No additional information is needed.

The revised CSF meets the requirements of 40 CFR 158.155 (Product Identity and Composition) and is acceptable.

The Labelling meets the requirements of 40 CFR 156.10 with respect to the Ingredient statement and the Storage and Disposal statements.

TRB/RD has no objections to the registration of the EP.
PRODUCT CHEMISTRY REVIEW

1. DP BARCODE No.: D231040  2. REG./File Symbol No.: 499-GIL

3. Registration [x]  4. Reregistration [ ], Rereg Case No.

5. Product Name: Whitmire PT 239 Tri Die Insecticide

6. Pesticide Type: Fungicide [ ]  Herbicide [ ]
   Insecticide [x]  Rodenticide [ ]  Antimicrobial [ ]
   Plant Growth Regulator [ ]  Others: __________________________

7. Uses: Food [ ]  Non food use [x]

8. Type of Submission: New [x]  Resubmission [x]  Amendment [ ]
   "ME-TOO" [ ]  Alternate Formulation [ ]  Repack [ ]
   Experimental Use Permit [ ]  Other (Specify)______________________

9. If "Me-Too" Registration, this product is [ ] is not [ ]
   similar or substantially similar to EPA's Reg. No.:_______.
   If not, comment in Confidential Appendix A on the differences
   between the registered and the new source where significant.

CONFIDENTIAL STATEMENT OF FORMULA, DATED 10/11/1996:

10. Type of formulation and the sources of active ingredients:
    a. Non-integrated formulation system.........................[x]
    b. Are all technical grade active ingredients used
       registered?  • yes [x]  • no [ ]
    c. Integrated formulation system...........................[ ]

11. Composition: The nominal concentrations (NC) of the active
    ingredients and the upper and lower certified limits (UCL &
    LCL) are as follows:

<table>
<thead>
<tr>
<th>Active ingredient(s)</th>
<th>% by weight</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NC</td>
</tr>
<tr>
<td>Pyrethrins</td>
<td>0.60</td>
</tr>
<tr>
<td>Piperonyl Butoxide</td>
<td>4.80</td>
</tr>
<tr>
<td>Silicon Dioxide</td>
<td>10.0</td>
</tr>
</tbody>
</table>
12. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:
   • yes [x]        • no [ ]

13. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:
   • yes [x]        • no [ ]

14. Clearance of intentionally added ingredients in the formulation for the intended use:
   a. Formulation intended for food use under 40CFR§180.1001:
      • yes [ ] • no [ ] • Some are cleared, others are not [ ]
      • Cleared under list:  • c [ ] • d [ ] • e [ ]
   b. Formulation intended for non-food use:
      • yes [x] • no [ ] • Some are cleared, others are not [ ]

15. For products produced by an integrated formulation system:
   • All impurities of toxicological significance have an UCL:
      • yes [ ]        • no [ ]        • not applicable [ ]
      • All other impurities ≥ 0.1% associated with the active ingredient in the product are reported at their nominal concentrations:
      • yes [ ]        • no [ ]        • not applicable [ ]

PRODUCT LABEL, EPA RECEIVED 10/23 /1996 :

16. The active ingredients statement (chemical identities, nominal concentrations) is consistent with the CSF • yes [x] • no [ ]

17. The formulation contains one of the following:
   • 10% or more of a petroleum distillate:  • yes [ ] • no [x]
   • 1% or more of methyl alcohol:          • yes [ ] • no [x]
   • sodium nitrite at any level:           • yes [ ] • no [x]
   • a toxic List 1 inert at any level:     • yes [ ] • no [x]
   • arsenic in any form:                   • yes [ ] • no [x]
18. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?

- yes [x]  
- no [ ]  
- not applicable [ ]

19. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:

- yes [x]  
- no [ ]  
- not applicable [ ]

20. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses:

- yes [x]  
- no [ ]

### PRODUCT CHEMISTRY DATA (SERIES 61 and 62)

<table>
<thead>
<tr>
<th>Data Required Fulfilled</th>
<th>MRID No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>61-1 Chemical Identity</td>
<td>Y</td>
</tr>
<tr>
<td>61-2 Starting Materials &amp; Manufact or Formulation Process</td>
<td>Y</td>
</tr>
<tr>
<td>61-3 Discussion of Impurities</td>
<td>Y</td>
</tr>
<tr>
<td>62-1 Preliminary Analysis</td>
<td>NA</td>
</tr>
<tr>
<td>62-2 Certified Limits</td>
<td>Y</td>
</tr>
<tr>
<td>62-3 Enforcement Analytical Method</td>
<td>Y</td>
</tr>
</tbody>
</table>
### PRODUCT CHEMISTRY DATA (SERIES 63)

<table>
<thead>
<tr>
<th>24. Physical/Chemical Properties</th>
<th>Data Required Fulfilled</th>
<th>Value or Qualitative Description</th>
<th>MRID No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>63-3 Physical State</td>
<td>Y</td>
<td>Liquid, Pressurized</td>
<td>42613701C</td>
</tr>
<tr>
<td>63-7 Density/Bulk Density</td>
<td>Y</td>
<td>8.30 lbs/gal</td>
<td></td>
</tr>
<tr>
<td>63-12 pH of Product</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-15a Flammability-Flash Point</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-15b Flame Extension</td>
<td>Y</td>
<td>18 inches</td>
<td>42613701C</td>
</tr>
<tr>
<td>63-16 Explodability</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-17 Storage Stability</td>
<td>NR</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-18 Viscosity</td>
<td>Y</td>
<td>21.1 cps</td>
<td>42613701C</td>
</tr>
<tr>
<td>63-19 Miscibility (With Hydrocarbon solvents)</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-20 Corrosion Characteristics</td>
<td>N</td>
<td></td>
<td></td>
</tr>
<tr>
<td>63-21 Dielectric Breakdown Voltage</td>
<td>NA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Explanations:** Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.