US EPA ARCHIVE DOCUMENT

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.

EP [x] MP [ ] 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:

Active ingredient(s)	% by weight NC	UCL	LCL
Pyrethrins	0.60	0.63	0.57
Piperonyl Butoxide	4.80	4.94	4.66
Silicon Dioxide	10.0	10.3	9.7

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

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)

21. Chemical IDs/Manufacture/ Analytical Information		Data Required Fulfilled	MRID No.
61-1	Chemical Identity	Y	42613701
61-2	Starting Materials & Manufact or Formulation Process	Y	" "
61-3	Discussion of Impurities	Y	42613701C
62-1	Preliminary Analysis	NA	
62-2	Certified Limits	Y	42613701C
62-3	Enforcement Analytical Method	Y	42613701

PRODUCT CHEMISTRY DATA (SERIES 63)

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

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.