US EPA ARCHIVE DOCUMENT

DATE OUT: 4/MAR/2002

SUBJECT: PRODUCT CHEMISTRY REVIEW OF Manufacturing Use Product [], End-Use Product [x] BARCODE No. : D281209; D262382 ; **CASE No.:** 006554 ;**EPA RECEIVED DATE:** 14/DEC/99; **EPA REG No.;** 100-1053; **PRODUCT NAME:** Havoc Rodenticide Bait Pack Pellets with Bitrex ; **COMPANY NAME:** Syngenta Crop Protection, Inc..; **MRID # :** 449922-01; 455026-02; 455835-02; **Action Code:** 675

FROM: Paul Horng, Ph. D., Environmental Scientist
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TO: Venus Eagle-Kunst, CRM
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INTRODUCTION:

The registrant, Syngenta Crop Protection, Inc., responded to our previous memorandum (Paul Horng; D262382; 8/AUG/00) by submitting additional product chemistry data in MRID # 455026-02 and ; the Confidential Statement of Formula (CSF), a basic formulation dated 14/AUG/01; to fulfill the data requirement for reregistration of the end-use product, Havoc Rodenticide Bait Pack Pellets with Bitrex, EPA Reg. No. 100-1053. The product was originally owned by Zeneca Ag Products. EPA Registration Number was 10182-337. It was acquired by Syngenta Crop Protection, Inc. on 23/FEB/2001.

FINDINGS:

1. The submitted data in MRID # 455026-02 satisfy the product chemistry data requirement Guidelines 62-3 (830-1800, Enforcement Analytical Method) and 63-17 (830-6317, Storage Stability). No additional data are required.

2. The submitted CSF, a basic formulation dated 14/AUG/01, has been filled out completely and correctly. The nominal concentration, upper limit, and lower limit of the active and inert ingredients in the CSF comply with the requirement of 40 CFR 158.175. All ingredients claimed in the CSF have been cleared for use in pesticide formulation. The CSF is acceptable.

3. Since the label requirements are still being developed, the Agency will request new labeling for these products when the Rodenticide Cluster RED document are amended. Label review related to product chemistry sections will be conducted until the Rodenticide Cluster RED has been amended.

RECOMMENDATIONS:

The registrant has satisfied all product chemistry data requirements for reregistration of this product. Once the Rodenticide Cluster RED has been amended, and the product label related to the product chemistry sections satisfy the new label requirements, the Agency will have no objection to the reregistration of the end-use product, Havoc Rodenticide Bait Pack Pellets with Bitrex , EPA Reg. No. 100-1053.

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

MRID # 449922-02.

GUIDELINE REFERENCE NO.(GRN)/TITLE 830-	VALUE OR QUALITATIVE DESCRIPTION/ METHODS USED WHERE APPLICABLE AND REFERENCES	Comments
-6302 Color.	Not required as per PR Notice 92-5.	NR
-6303 Physical State.	Solid at 20°C.	A
-6304 Odor.	Not required as per PR Notice 92-5.	NR
-6314 Oxidation/ Reduction Action.	N/A, none of the components used in the formulation are known to be oxidizing or reducing agents.	N/A
-6315 Flammability.	N/A, the product contains no combustible liquid.	N/A
-6316 Explodability.	N/A, the product contains no explosive agents. No explosive potential is anticipated.	N/A
-6317 Storage Stability.	A cardboard box containing one hundred (50 g) bait packs of the pellets (its commercial container) was stored in the HACCO warehouse, Randolph, WI under normal warehouse temperature (7 -27°C) and humidity (16-74%) conditions for approximately one year. The mean concentration of the active ingredient in the product at initial, two and 12 months after storage was found to be 0.0051, 0.0051, and 0.0046%, respectively. In general, the active ingredient in the product was stable after one year of storage. No changes in physical properties were observed. MRID # 455026-02.	A
-6319 Miscibility.	N/A, the product is solid and not to be diluted with water.	N/A
-6320 Corrosion Characteristics	No corrosion on the packaging container was observed. MRID # 455026-02.	A
-7000 pH.	N/A, the active ingredient (0.005%) is not water soluble. It is formulated with 99.995% solid material.	N/A
-7100 Viscosity.	N/A, the product is not a liquid.	N/A
-7300 Bulk Density	40.0 lbs per cubic feet.	A

A: acceptable; N/A: not applicable; Gap: data gap; NR: not required.

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Page _____ is not included in this copy.

Pages __3___ through __4__ are not included in this copy.

The material not included contains the following type of information:

__X__ Identity of product inert ingredients.

__ _ __ Identity of product impurities.

__X__ 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.

_____ Internal deliberative information.

_____ Attorney-Client work product.

_____ Claimed Confidential by submitter upon submission to the Agency.

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.