5-24-91

PRODUCT CHEMISTR

TO: PM ____ FROM: Reviewer: INDIRA Date: 05/24/91

EPA REG. NO.: 11556-RNT PRODUCT NAME: Bayoxide™ Pour-On Insecticide

Please provide the requested information for the following checked items:

1. [ ] Submit the product specific product chemistry data for your product. [ ] If submitted earlier, provide MRID Number(s). [ ] Your product is not sufficiently similar to the product you referenced.

2. In reference to the Confidential Statement of Formula (CSF), please provide the following:

[ ] a) pH of product or pH at a specified water dilution.

[ ] b) Density of product. Data matrix states clearly the product as .95 whereas block 7 CSF states as 7.91 lb/gal, please provide consistant units in both

[ ] c) Flash point of product.

[ ] d) Flash point of product with propellent as per item #6(q) or item #5(c).

[ ] e) Flame extension of product including flashbacks if noted.

[ ] f) The upper and lower certified limits based on the pure active ingredients rather than the technical or concentrate. Note that the lower limit of the active ingredients must be the same as the label claim in pure active form.

[ ] g) The upper and lower certified limits of the individually added inerts.

[ ] h) Lower (14.b) Certified Limit cannot be same as % by wt (13.b) there shd be some variation

[ ] i) Please ask the applicant to provide certified limits as underlined above since Reg No-3125-356 is 98% pure Hence 1.1% x 98% = 1.07% in pure ai form. (13b)

[ ] j)

3. [ ] Based on the current CSF dated 5/24/90, your product ~~will not meet the label claim for the active ingredient. Please revise the label or the CSF so that the information agrees.~~ Cannot be accepted until the stated conditions are satisfied

Note To PM. This review is incomplete since the Label is missing Hence the C.S.F cannot be compared or completed

PRODUCT CHEMISTRY REVIEW (cont'd)

[ ] g) The terms active ingredient(s) and inert ingredients should be in the same type size, be aligned to the same margin and be equally prominent.

[ ] h)

[ ] i)

6. In reference to the product specific data requirements, provide the following information:

[ ] a) Statement of Composition: A complete description of the manufacturing/formulation process. Describe equipment used, mixing time, temperature, pressure, etc.

[ ] b) Discussion of Formation of Unintentional Ingredients: A brief description of impurities formed during the manufacturing/formulation process, in packaging or during storage. If you do not expect any impurities during these stages, please so state.

[ ] c) Certification of Limits: Upper and lower limits of each active and individually added inert component. The lower limit for the active ingredients must be the same as the label claim in pure active form.

[ ] d) Analytical Method: Provide the methods used to analyze for the active ingredients or a full reference for a published method or MRID Number(s).

[ ] e) Color: In common terms.

[ ] f) Physical State: e.g., solid, liquid, pressurized liquid, etc.

[ ] g) Odor: In common terms. - Specify mild odor

[ ] h) Density: e.g., lbs/gallon for liquids or lbs/cu.ft. for solids. 9.5

[ ] i) pH: Provide pH of product or pH of a specified water dilution.

[ ] j) Oxidizing or Reducing Action: Note these characteristics, if any.

[ ] k) Explodability: Note these characteristics, if any.

[ ] l) Viscosity: Can be expressed in centipoise or centistokes.

[ ] m) Miscibility: Note these characteristics if product is an emulsifiable liquid and mixed with oil.

[ ] n) Corrosion Characteristics: This information can be noted during the storage stability study.

[ ] o) Dielectric Breakdown Voltage: For products used near electrical equipment.

Do not use ground water ecy