3-25-93

REG. NO: 57978-U
FILE SYMBOL: _____

PRODUCT CHEMISTRY REVIEW FOR END USE PRODUCTS

TO: PM 31 (Lee) PRODUCT NAMES: _____

FROM: Anna Skapars

THRU: Harold Podall, Section Head

CHEMICAL: Settocide A 50% Solution

MRID NOS: 419800-1, 419800-2, 419800-3

Food Use _____ Non Food Use ✓

Inerts cleared: c ( ) d ( ) e ( ) yes ( ) no ( )

Inerts List 1 ( ) Other ( )

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 your referenced.

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

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

   [ ] b) Density of product.

   [ ] c) Flash point of product.

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

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

PM Review 10-24-94
(1) TGAI previously addressed under (-G).
(2) label comment will be addressed later
(3) EPA statement not necessary since label declares flammability statement.

128972

Guideline Reference No. (40 CFR 158.155, 160, 162, 165 & 167)

Series 61

| | | |
|---|---|---|
| 61-1 | Product Identity and Disclosure of ingredients | MRID No. 419800-1 Confidential Statement of Fo |
| 61-2 | Description of starting materials and manufacturing process. | MRID No. 419800-1 |
| 61-3 | Discussion of Formation of Impurities | MRID No. 419800-1 |

Series 62

| | | |
|---|---|---|
| 62-1 | Preliminary analysis | MRID No. 419800-2 |
| 62-2 | Certification of ingredient limits | MRID No. 419800-2 |
| 62-3 | Analytical methods to verify certified limits. | MRID No. 419800-2 (Method is being develope |

Series 63

| | | |
|---|---|---|
| 63-2 | Color | very pale to pale yellow |
| 63-4 | Odor | Mild odor of aromatic compounds |
| 63-5 | Physical state | liquid. |
| 63-5 | Melting point | NOT given |
| 63-6 | Boiling point | not given |
| 63-7 | Density, Bulk density Specific gravity | 1.28 at 25°C. |
| 63-8 | Solubility | not given |
| 63-9 | Vapor pressure | not given |
| 63-10 | Dissociation constant | not given |

Series 63 (cont)

| | | |
|---|---|---|
| 63 - 11 | Octanol/water partition coefficient | not given |
| 63 - 12 | pH | 11 - 12 |
| 63 - 13 | Stability | not given |
| 63 - 14 | Oxidizing or reducing action | - minimal reducing agent |
| 63 - 15 | Flammability | - does not contain combustible liquids |
| 63 - 16 | Explodability | - not potentially explosive |
| 63 - 17 | Storage stability | - in development - will be submitted |
| 63 - 18 | Viscosity | - 21 centipoises at 23°C |
| 63 - 19 | Miscibility | - not emulsifiable liquid |
| 63 - 20 | Corrosion characteristics | - minimally corrosive to steel will repeat with 1yr storage stability |
| 63 - 21 | Dielectric breakdown | - not to be used around electrical equipment. |

The following physical and chemical characteristics data series 63 have not been provided and it shall be provided.
Guidelines ref. No. 63-6 - boiling point must be provided, Guidelines Ref. No. 63-9 - vapor pressure not provided it must be provided, Guidelines Ref No. 63-10 - dissociation constant not provided it should be provided, Guidelines Ref. No. 63-11 Octanol/water partition coefficient not provided should be provided, Guidelines Ref No. 63-17 - storage and stability not provided must be provided.

Conclusions and Recommendations

The product chemistry data requirements for this 50% product have not been completely satisfied. The following physical and chemical characteristics data is required to be submitted

| | | |
|---|---|---|
| TGAI | 63-6 | Boiling point |
| TGAI | 63-9 | Vapor pressure |
| TGAI | 63-10 | Dissociation constant |
| PAI | 63-11 | Octanol/water partition coefficient |
| EP | 63-17 | Storage stability data. |

1. Proposed Labeling

The preferred declaration of the active ingredient in the ingredient statement should be: "Sodium hydroximethylaminoacetate"

The net contents must be declared on the label or on the container.

2. Product Identity and Composition.

Submit revised legible Confidential Statement of Formula including legible certified limits, date and signature.

Product chemistry data under MRID No's 419800-1, 419800-2 and 419800-3 include complete manufacturing process and analytical methods used. Development of direct analytical method is in progress.

This formulation is not cleared by EPA for use to manufacture paper & paperboard products that may contact food.

Anne Skegas
3-25-93

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H.S. 3-25-93