

US EPA ARCHIVE DOCUMENT

8-18-94

DATE OUT: AUG 18 1994

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:  
AC 303630 2SC Insecticide-Miticide.

A MANUFACTURING-USE [ ] OR AN END-USE PRODUCT [X]  
DP Barcode 204617 Reg. No. or File Symbol No. 241-EUP-REI

TO: Dennis Edwards, Jr./Meredith Johnson  
PM Team No. 19

FROM: Sami Malak, Ph.D., Chemist; August 18, 1994 *Sami Malak*  
Product Chemistry Review Section  
Registration Support Branch/RD (H7505W)

THRU: Harold Podall, Ph.D., Section Head *HP 8/18/94-1*  
Registration Support Branch/RD (H7505W)

SUMMARY OF INFORMATION REVIEWED AND FINDINGS

1. The registrant submitted adequate product chemistry information in support of the proposed Experimental Use Permit for this end-use product, AC 303630 2SC Insecticide-Miticide, Reg. No. 241-EUP-REI.
2. The submitted label, received June 13, 1994 and product's CSF, dated April 29, 1994 are acceptable. All inert ingredients are cleared for non-food uses. Please refer to product's CSF in MRID #432682-01 to correct the CAS Number for one of the inert ingredients.
3. When submitting for registration for this end-use product, AC 303630 2SC Insecticide-Miticide, and, provided that the technical source is registered or eligible for reregistration, no additional product chemistry information will be needed, except for any changes in product labeling, CSF, or additional product chemistry data not discussed in this memorandum.

PRODUCT CHEMISTRY REVIEW

END-USE PRODUCT [X] MANUFACTURING-USE PRODUCT [ ]

EPA Reg. No. (or File Symbol No.) 241-EUP-REI

Registration [ ]  
Experimental Use Permit [X]

Reregistration [X]  
Case No.: \_\_\_\_\_

DP Barcode/Chemist:

- 1) 204617/Sami Malak 3)  
2) 4)

1. Product Name: AC 303630 2SC Insecticide-Miticide, an end-use product containing the active ingredient AC 303630 [4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)pyrrole-3-carbonitrile], CAS #122453-73-0; MW 408.

2. Company: 000241 American Cyanamid Company.

3. Type of Submission: New [X] Resubmission [ ] Amendment [ ]  
"ME-TOO" [ ] Alternate Formulation [ ] REPACK [ ]  
Expt Use Permit [ ] Other (Specify) \_\_\_\_\_

4. CONFIDENTIAL STATEMENT OF FORMULA

4a. Type of formulation and source registration

- Non-integrated formulation system [X]
  - Are all TGAIs used registered • yes [X] • no [ ]
- Integrated formulation system [ ]
- If "ME-TOO", specify EPA Reg. No. of existing product:

4b. Clearance of inerts for non-food or food use:

- Cleared for food use under 40CFR§180.1001:  
• yes [ ] • no [ ]. If yes: • c [ ] • d [ ] • e [ ]  
Cleared for non-food use: • yes [X] • no [ ]

4c. Physical state of product: Liquid

4d. The chemical IDs, analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in GRN 61, 62, and 63-7, 63-12, and 63-15, respectively. • yes [X] • no [ ]

- 4e. Density (or bulk density for solids): 1.11 gm/ml at 20°C  
(9 to 9.6 lb/gal)
- 4f. pH (if dissolved or dispersed in water): 7.1
- 4g. Flash point and/or flame extension: >200°F
- 4h. NCs and CLs are acceptable: • [X] • not acceptable [ ]
- 4i. Active ingredient(s) NC ULCL LCL
- A. 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)pyrrole-3-carbonitrile (90% pure)... 21.44 [REDACTED]
- B.
- C. **MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED**
- 4j. For products produced by an integrated formulation system:
- All impurities of toxicological significance have an UCL: • yes [ ] • no [ ] • not applicable [X]
  - All impurities  $\geq 0.1\%$  in the product have been identified: • yes [ ] • no [ ] • not applicable [X]

## 5. PRODUCT LABEL

- 5a. The active ingredients statement (chemical IDs and NCs) is consistent with the CSF: • yes [X] • no [ ]
- 5b. 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]
- 5c. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?  
• yes [ ] • no [ ] • not applicable [ ]
- 5d. The appropriate warning statement regarding flammability or explosive characteristics of the product are given on the label:  
• yes [ ] • no [ ] • not applicable [X]

- 5e. 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 [ ]
- 6f. Does the product require an expiration date at which time the NC falls below the LCL (based on the one year storage stability data or other information):  
  • yes [ ]   • no [X]

6. PRODUCT CHEMISTRY (GRN 61, 62, 63)

6a. <u>Chemical IDs/Manufacture/ Analytical Information</u>	<u>Accept of Information</u>	<u>MRID No.</u>
61-1 Chemical ID (see Appendix) <sup>1</sup>	A	432682-01
61-2a Manufacturing Process <sup>2</sup>	A	432682-01
61-2b Formulation Method <sup>3</sup>	A	432682-01
61-3 Discussion of Impurities <sup>4</sup>	A	432683-01
62-1 Analysis <sup>5</sup>	A	432682-01
62-2 Certified Limits <sup>6</sup>	A	432682-02
62-3 Analytical Method for AIs <sup>7</sup>	A	432682-02

<u>6b. Physical/Chemical Properties</u>	<u>Accept of Data</u>	<u>Value or qualitat descrip<sup>8</sup></u>	<u>MRID No.</u>
63-3 Physical State	A	Liquid	432682-03
63-7 Density/Bulk Density (gm/cc)	A	1.11 gm/ml (9.0 to 9.6 lb/ gal)	432682-03
63-12 pH of product <sup>9</sup>	A	7.1	432682-03
63-14 Oxid/Red Action	A	Oxidizer	432682-30
67-15a Flash Point(°C) <sup>10</sup>	A	>200°F	432682-03
63-15b Flame Extension	NA		
63-16 Explodability	NA	No impact sensitivity	432682-03
63-17 Storage Stability (% degradation of AIs at 20-30°C for ≥ 1 year)	A	None	432682-03
63-18 Viscosity	A	785 cO at 6 rpm , 498 cP at 12 rpm	432-682-03
63-19 Miscibility (with hydrocarbon solvents) <sup>11</sup>	NA		
63-20 Corrosivity (specify metals/conditions)	A	non-corrosive to HDPE	432682-03
63-21 Dielectric Breakdown Voltage <sup>12</sup>	NA		

**Explanations:** A = Acceptable; N = not acceptable; NA = technically not applicable; G = data gap; U = requires upgrading; W = waived; E = EPA estimate.

**Footnotes:** <sup>1</sup> See Confidential Appendix A for additional information; <sup>2</sup> For MP/EP products produced by an integrated formulation system; <sup>3</sup> For products produced from a TGAI or MP; <sup>4</sup> May be waived unless actual/possible impurities are of tox concern; <sup>5</sup> Five batch analysis required for products produced by an integrated formulation system; <sup>6</sup> If different from standard CLs recommended in 40CFR§158.175, this should be discussed in Confidential Appendix A; <sup>7</sup> Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc. <sup>8</sup> Provide brief description, e.g., color - yellow or property value, e.g. density 1.25 g/cc. Unless otherwise indicated, the property should be at 25 C ; <sup>9</sup> If product is a water solution or dispersion; <sup>10</sup> Not required for aerosols; <sup>11</sup> Emulsifiable liquids only; <sup>12</sup> For end-use products used near electrical equipment.

cc: S. Malak and Central File (Reg. No. 241-EUP-REI  
H7505W:RD:RSB:PCRS:CS-1:Rm650:S. Malak:s.m.:08/18/94:703-308-8392:241-EUP-.REI.

DP BARCODE: D204617

*Sami*

CASE: 044720  
SUBMISSION: S468291

DATA PACKAGE RECORD  
BEAN SHEET

DATE: 06/20/94  
Page 1 of 1

\* \* \* CASE/SUBMISSION INFORMATION \* \* \*

CASE TYPE: EUP (SECT 5) ACTION: 700 EUP NC N-F/F USE  
RANKING : 20 POINTS (J)  
CHEMICALS: 129093 1H-Pyrrole-3-carbonitrile, 4-bromo-2-(4-chlorophen 21.4400%

ID#: 000241-EUP-REI

COMPANY: AMERICAN CYANAMID COMPANY

PRODUCT MANAGER: 19 DENNIS EDWARDS, JR. 703-305-6386 ROOM: CM2 207

PM TEAM REVIEWER: MEREDITH JOHNSON 703-305-7080 ROOM: CM2 201

RECEIVED DATE: 06/13/94 DUE OUT DATE: 10/11/94

\* \* \* DATA PACKAGE INFORMATION \* \* \*

DP BARCODE: 204617 EXPEDITE: N DATE SENT: 06/20/94 DATE RET.: / /  
CHEMICAL: 129093 1H-Pyrrole-3-carbonitrile, 4-bromo-2-(4-chlorophenyl)-1-(et  
DP TYPE: 001 Submission Related Data Package

CSF: Y LABEL: Y

ASSIGNED TO	DATE	IN	DATE	OUT	ADMIN DUE DATE: 09/08/94
DIV : RD	/	/	/	/	NEGOT DATE: / /
BRAN: RSB	/	/	/	/	PROJ DATE: / /
SECT: PCRS	/	/	/	/	
REVR :	/	/	/	/	
CONTR:	/	/	/	/	

\* \* \* DATA REVIEW INSTRUCTIONS \* \* \*

Please review these 3 volumes of product chemistry data, submitted to support an EUP for greenhouse ornamentals. This is a NEW chemical, an EUP was issued in May for cotton. The MRID Nos. are 432682-01, 432682-02, and 432682-03. Please call me at 305-7080 if there are any questions. Thank you, Meredith Johnson

*\* CSF is in Volume 3*

\* \* \* DATA PACKAGE EVALUATION \* \* \*

No evaluation is written for this data package

\* \* \* ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION \* \* \*

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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