

DATE OUT: 03 Apr 2002

SUBJECT: EP [x] MP [] PRODUCT CHEMISTRY REVIEW
DP BARCODE No.: D280156
REG./File Symbol No.: 72919-R
PRODUCT NAME: EH-2001
COMPANY: Exit Holdings L.L.C.

TO: PM #04, Tina Levine/Geraldine McCann
Insecticide-Rodenticide Branch
Registration Division (7505C)

FROM: Bruce F. Kitchens, Chemist
Technical Review Branch
Registration Division (7505C)

Bruce F. Kitchens
03 Apr 2002

INTRODUCTION:

The registrant, Exit Holdings L.L.C., is responding to a previous product chemistry review. In that review, it was determined that a revised Confidential Statement of Formula (CSF) with the correct total weight in block #17 should be submitted to the Agency. It was also determined that the data requirement for the Enforcement Analytical Method (40 CFR 158.180) was not satisfied. With this submission, the registrant is submitting a revised basic CSF dated 28 Nov 2001 and product chemistry data contained in 455511-01. The active ingredients in this product are Yellow mustard seed (powdered) and alpha-Olefin sulfonate, sodium with label nominal concentrations of 10.89 and 6.91% ai, respectively. This product is intended for use as a rodenticide. The Technical Review Branch (TRB) has been asked to review this submission.

SUMMARY OF FINDINGS:

TRB has reviewed this submission and reports the following findings:

1. The correction to the total weight in block#17 of the CSF has been made and is the correct value.
2. The Enforcement Analytical Method supplied by the registrant is the ASTM method entitled: **Standard Test Method for Synthetic Anionic Ingredient by Cationic Titration (Designation: D3049-89 Reapproved 1996)**. This method is sufficient for the quantitation of the active

ingredient alpha-olefin sulfonate, sodium in situ. However, this method is not sufficient as an enforcement analytical method. This method has not demonstrated its ability to quantitate the active ingredient in the end-use product. This is the purpose of the enforcement analytical method. The registrant should continue to develop an analytical method appropriate for the end-use product.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

1. The basic formulation CSF for EH-2001 dated 26 Nov 2001 is acceptable.
2. This submission does not meet the data requirements as specified in 40 CFR 158.180 with respect to the Enforcement Analytical Method. The registrant should continue to develop an analytical method appropriate for the end-use product.