

DATE OUT: September 02, 1997

SUBJECT: EP MP PRODUCT CHEMISTRY REVIEW
DP BARCODE No.: D238512 REG./File Symbol No.: 8254-1
PRODUCT NAME: 4 the Birds Transparent Bird Repellent
COMPANY: Bird Control International Corp.

FROM: *AS*
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Technical Review Branch/RD (7505C)

TO: Jean Holmes, PM Team 04
Insecticide Branch/RD (7505C)

INTRODUCTION

The Registrant proposes the reregistration of the End-Use Product (EP), 4 the Birds Transparent Bird Repellent. Product Chemistry data (MRID 44357201) are submitted in support of the reregistration.

FINDINGS

The product chemistry data are adequate for the following areas:

- 830.1550 Product Identity and Composition
- 830.1600 Beginning Materials
- 830.1650 Formulation of Product
- 830.1670 Formation of Impurities
- 830.1750 Certified Limits

The product chemistry data are not adequate for the following areas:

- 830.1700 Preliminary Analysis - No data are submitted.
- 830.1800 Enforcement Analytical Method - No method is submitted. The Registrant claims that the method used to verify the polybutene in the EP is infrared analysis. No written method is provided, and only two infrared scans are provided.

CONCLUSIONS

For the Preliminary Analysis (830.1700), the Registrant should provide results of analyses of five or more production batches of the product. This information is required for EPs in cases where the active ingredient source is not an EPA-registered product. (If the active ingredient source is registered, then the Registrant

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should provide the EPA Registration No. on the CSF.) These analyses are designed to measure the amount of active ingredient in the formulated product. The analyses should be performed with a validated analytical method.

For the Enforcement Analytical Method (830.1800), the analytical method submitted should be able to determine and measure the quantity of active ingredient in the product. The method should be clearly written so that it could be used by analysts in the laboratory. The method should be suitable for use in state and federal enforcement programs.

The Registrant's statement, "The uniformity and consistency of each batch of 4 THE BIRDS TRANSPARENT BIRD REPELLENT is assured by the accurate measurement of the quantity of the two ingredients mixed in the batch process", is not an acceptable substitute for the analyses of samples for the active ingredient by a validated analytical method.

TRB/RD concludes that the information submitted is not suitable for reregistration of the EP.

EP [x] MP [] PRODUCT CHEMISTRY REVIEW

- 1. DP BARCODE No.: D238512 2. Reg./File Symbol No.: 8254-1
- 3. Registration [] 4. Reregistration [x], Rereg Case No. _____
- 5. Product Name: 4 the Birds Transparent Bird Repellent
- 6. Pesticide Type: Fungicide [] Herbicide []
 Insecticide [] Rodenticide [] Antimicrobial []
 Plant Growth Regulator [] Others: Repellent
- 7. Uses: Food [] Non food use [x]
- 8. Type of Submission: New [] Resubmission [] Amendment []
 "ME-TOO" [] Alternate Formulation [] Repack []
 Experimental Use Permit [] Other (Specify) 8-Month Response
- 9. If "Me-TOO" Registration, this product is [] is not [']
 similar or substantially similar to EPA's Reg. No.: _____,
 If not, comment in Confidential Appendix A on the differences
 between the registered and the new source where significant.

CONFIDENTIAL STATEMENT OF FORMULA, DATED 08/13 /1997 :

- 10. Type of formulation and the sources of active ingredients:
 - a. Non-integrated formulation system..... []
 - b. Are all technical grade active ingredients used
 registered? • yes [] • no []
 - c. Integrated formulation system..... [x]
- 11. Composition: The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

<u>Active ingredient(s)</u>	<u>% by weight</u>		
	<u>NC</u>	<u>UCL</u>	<u>LCL</u>
Polybutene	80.0	83.0	77.0

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18. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?

- yes [] • no [] • not applicable []

19. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:

- yes [] • no [] • not applicable [x]

20. 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 []

PRODUCT CHEMISTRY DATA (SERIES 830.0000)

21. <u>Chemical IDs/Manufacture/ Analytical Information</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830.1550 Chemical Identity	Y	44357201
830.1600 Starting Materials 830.1650 Formulation Process	Y	" "
830.1670 Discussion of Impurities	Y	" "
830.1700 Preliminary Analysis	N	
830.1750 Certified Limits	Y	44357201
830.1800 Enforcement Analytical Method	N	

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PRODUCT CHEMISTRY DATA (SERIES 830.0000)

<u>24. Physical/Chemical Properties</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitative Description</u>	<u>MRID No.</u>
830.6303 Physical State	Y	Gel	44357201
830.7300 Density/Bulk Density	Y	7.47 lb/gal.	" "
830.7000 pH of Product	Y	7.0	" "
830.6315 Flash Point	Y	224 C (435 F)	" "
830.6315 Flame Extension	NA		
830.6316 Explodability	NA		
830.6317 Storage Stability	Y	Stable	44357201
830.7100 Viscosity	Y	615 cSt at 100 C	" "
830.6319 Miscibility (With Hydrocarbon solvents)	NA		
830.6320 Corrosion Characteristics	NA		
830.6321 Dielectric Breakdown Voltage	NA		

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

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