

DATE OUT: 24 May 2000

SUBJECT: EP [x] MP [ ] PRODUCT CHEMISTRY REVIEW  
DP BARCODE No.: D263765  
REG./File Symbol No.: 51036-320  
PRODUCT NAME: Tribufos 6EC  
COMPANY: Micro-Flo Company

TO: PM #25, Jim Tompkins/Wesley Allen  
Herbicide Branch  
Registration Division (7505C)

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

*Bruce F. Kitchens*  
*24 May 2000*

**INTRODUCTION:**

The registrant, Micro-Flo Company, is submitting product chemistry data in support of Tribufos 6EC (EPA Reg. No. 51036-320). The active ingredient in this product is tribufos technical at 71.86% active ingredient. The registrant has submitted a basic Confidential Statement of Formula (CSF) dated 15 Feb 2000 and product chemistry data contained in MRID#s 451208-01 and -02. 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:

- All inert ingredients are cleared for use in formulated products.
- The nominal concentration listed on the label and the CSF are the same.
- The label contains the appropriate storage and disposal statements.
- The certified limits as proposed on the CSF are acceptable.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

- This submission meets the data requirements as specified in 40 CFR 158.155, 158.160, 158.165, 158.167, 158.175, and 158.180 with respect to product identity and composition, description of materials used to produce the product, description of formulation process, discussion of formation impurities, certified limits, and enforcement analytical method.
- This submission also satisfies the data requirement as specified in 40 CFR 158.190 with respect to physical and chemical characteristics.

EP [ ] MP [ ] PRODUCT CHEMISTRY REVIEW

1. DP BARCODE No.: D263765 2. REG./File Symbol No.: 51036-320
3. Registration  4. Reregistration , Rereg Case No. \_\_\_\_\_
5. Product Name: Tribufos 6EC
6. Pesticide Type: Fungicide  Herbicide   
 Insecticide  Rodenticide  Antimicrobial   
 Plant Growth Regulator  Others: \_\_\_\_\_
7. Uses: Food  Non food use
8. Type of Submission: New  Resubmission  Amendment   
 "ME-TOO"  Alternate Formulation  Repack   
 Experimental Use Permit  Other (Specify) \_\_\_\_\_
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 (15 Feb 2000):

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.....
11. Composition: The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

Active ingredient(s)	NC	% by weight	
		UCL	LCL
Tribufos Tech.	70.5	72.6	68.4

12. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:

yes  no

13. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:

yes  no

14. Clearance of intentionally added ingredients in the formulation for the intended use:

- a. Formulation intended for food use under 40CFR§180.1001:

yes  no  Some are cleared, others are not

Cleared under list: c  d  e

- b. Formulation intended for non-food use:

yes  no  Some are cleared, others are not

15. For products produced by an integrated formulation system:  
All impurities of toxicological significance have an UCL:

yes  no  not applicable

All other impurities 0.1% associated with the active ingredient in the product are reported at their nominal concentrations:

yes  no  not applicable

PRODUCT LABEL, EPA RECEIVED (none):

16. The active ingredients statement (chemical identities, nominal concentrations) is consistent with the CSF yes  no

17. The formulation contains one of the following:

10% or more of a petroleum distillate:	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>
1% or more of methyl alcohol:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
sodium nitrite at any level:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
a toxic List 1 inert at any level:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
arsenic in any form:	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>

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

yes [ ]                      no [ ]                      not applicable [x]

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

yes [x]                      no [ ]                      not applicable [ ]

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 (GROUP A)

<u>21. Chemical IDs/Manufacture/ Analytical Information</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830-1550 Chemical Identity	Y	451208-01
830-1600 Description of Materials Used to Produce the Product	Y	"
830-1620 Description of Production Process	NA	
830-1650 Description of Formulation Process	Y	451208-01
830-1670 Discussion of Impurities	Y	"
830-1700 Preliminary Analysis	NA	
830-1750 Certified Limits	Y	451208-01
830-1800 Enforcement Analytical Method	Y	"

PRODUCT CHEMISTRY DATA (GROUP B)

<u>24. Physical/Chemical Properties</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitative Description</u>	<u>MRID No.</u>
830-6302 Color	NR		
830-6303 Physical State	Y	liquid @ 25°C	451208-02
830-6304 Odor	NR		
830-6314 Oxidation/Reduction:Chemical Incompatability	NA	test article does not contain any known explosive components	
830-6315 Flammability/Flame Extension	Y	81°C	451208-02
830-6316 Explodability	NA		
830-6317 Storage Stability of Product	NR	see PR-Notice 92-5	
830-6319 Miscibility	Y	no separation	451208-02
830-6320 Corrosion Characteristics	Y	less than 0.0001 in/yr for plastic & stainless steel 0.0002 in/yr for low carbon steel coupons	"
830-6321 Dielectric Breakdown Constant	NR		
830-7000 pH	Y	6.91 @ 25°C	451208-02
830-7100 Viscosity	Y	14 mPas @ 25°C	"
830-7300 Density	Y	1.0118g/ml @ 25°C	"

**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.