



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

September 8, 1992

MEMORANDUM

SUBJECT: Reregistration of S,S,S-Tributyl Phosphorotrithioate (DEF) Defoliant, a List B Chemical: Miles Inc. Response to DEF (Case # 2145; Chemical # 074801) Reregistration Product Chemistry Data Requirements (Regarding Physical State and pH Guideline # 63-3 and 63-12). (MRID No. 423827-01) CBRS # 10286; DP BARCODE: D180879).

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THRU: William J. Hazel, Ph.D., Section Head *W. J. Hazel*
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TO: B. Sidwell/M. Wilhite, PM Team 53
Accelerated Reregistration Branch
Special Review and Reregistration Division (H7508W)

In response to our review of K. W. Dockter (dated 12/9/91), the registrant Miles Inc. (formerly Mobay) has submitted product chemistry data regarding S,S,S-tributyl phosphorotrithioate (DEF) physical state and pH (Guideline # 63-3 and 63-12). We will restate the data requirement for Miles Inc DEF TGA I product chemistry below regarding physical state and pH, followed by the registrant's response and our comments.

Data Requirement: Regarding Physical State and pH (Guideline # 63-3 and 63-12)

Miles Inc (formerly Mobay) has previously provided data (MRID 416188-01, 02, and 03) for the registered technical S,S,S-tributyl phosphorotrithioate (DEF) EPA Reg. No. 3125-96. It was concluded that "the temperature at which the physical state (Guideline # 63-3) was observed is required. Also, we object to waiving the pH (63-12) requirement, because DEF is used as an aqueous suspension" (see K. W. Dockter memo dated 12/9/91).

Registrant's Response to Data Requirement: Regarding physical State and pH (Guideline # 63-3 and 63-12)

Miles Inc. has submitted product chemistry data (MRID No. 423827-01) regarding physical state and pH (Guideline # 63-3 and 63-12) of S,S,S-tributyl phosphorotrithioate technical (EPA Reg. No. 3125-96).

The performing Laboratory was Miles Inc. Agriculture Division and the data were submitted to the Agency on 6/23/92. The registrant indicates that the temperature at which the physical state of S,S,S-tributyl phosphorotrithioate technical (DEF) was observed was 25 °C (ambient). The pH of a 5% w/v suspension of DEF technical in water was 4.5.

CBRS Comments: Regarding physical state and pH (Guideline # 63-3 and 63-12)

These deficiencies are resolved. All product chemistry requirements for reregistration of DEF technical (EPA Reg. No. 3125-96) have been satisfied.

cc: DEF S.F., R.F., List B file, F. Toghrol, F. Chow (HED/CCB), Circ.,

RDI: W. Hazel (9/4/92): E Zager (9/4/92)
H7509C:CBII:RS:F.Toghrol:F.T.:RM:804B:CM#2:(703)305-7887:9/4/92.

PRODUCT CHEMISTRY

Case No.: 2145 Case Name DEF
Chemical No(s): 074801
Chemical Name(s): S,S,S-tributyl phosphorotrithioate
Registrant: Miles Inc (formerly Mobay)

| Guideline Number | Is requirement applicable? | Does summary or available information indicate MRID is a candidate for Phase 5 review? | Are additional data required? | MRID Number ^a |
|------------------|----------------------------|--|-------------------------------|--------------------------|
| 61-1 | Y | Y | N | 41618801 |
| 61-2(a) | Y | Y | N | 41618801 |
| 61-2(b) | Y | Y | N | 41618801 |
| 62-1 | Y | Y | N | 41618802 |
| 62-2 | Y | Y | N | 41618802 |
| 62-3 | Y | Y | N | 41618802 |
| 63-2 | Y | Y | N | 41618803 |
| 63-3 | Y | Y | N | 42382701 |
| 63-4 | Y | Y | N | 41618803 |
| 63-5 | N | N/A | N/A | N/A |
| 63-6 | Y | Y | N | 41618803 |
| 63-7 | Y | Y | N | 41618803 |
| 63-8 | Y | Y | N | 41618803 |
| 63-9 | Y | Y | N | 41618803 |
| 63-10 | N/A | N/A | N/A | N/A |
| 63-11 | Y | Y | N | 41618803 |
| 63-12 | Y | Y | N | 42382701 |
| 63-13 | Y | Y | N | 41618803 |

Key: Y=yes; N=no; N/A=not applicable.