

DATE OUT: 15/DEC/99

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Manufacturing Use [], End Use Product [x]
BARCODE No.: D261305 EPA RECEIVED DATE: 21/JUL/99 Reg./File Symbol No.: 10707-44
PRODUCT NAME: X-Cide 207 Industrial Microbicide MRIDs: 449079-01, 449079-02, 449079-03
COMPANY NAME: Baker Petrolite Corporation Action Code: 674

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PRB/SRRD (7508C) 12/15/99

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INTRODUCTION:

With this submission, the registrant, Baker Petrolite Corporation, submitted a CSF, a basic formulation dated 19/JUL/99, and a proposed label EPA received 21/JUL/99. The registrant is requesting for FIFRA Section 4 reregistration of the product, X-Cide 207 Industrial Microbicide, EPA Reg. No. 10707-44. This product contains 5.36% 5-chloro-2-methyl-4-isothiazolin-3-one, 1.62% 2-methyl-4-isothiazolin-3-one, and 93.02% inert ingredients.

A Reregistration Eligibility Decision (RED), Case number 3092, was issued in September, 1998 for the Technical Grade Active Ingredient (TGAI), Methylisothiazolinone (Kathon), which includes the active ingredients 5-chloro-2-methyl-3-(2H)-isothiazolone and 2-methyl-3-(2H)-isothiazolone. The Agency has previously identified and required the submission of the generic data required to support reregistration of products containing methylisothiazolinone active ingredients. The Agency has completed its review of these generic data and has determined that the data are sufficient to support reregistration of all products containing methylisothiazolinone.

FINDINGS:

1. The registrant must be advised that this product may not cite the physical/chemical property data of EPA Reg. No. 707-128. Comparison of the CSFs indicate that the subject product and EPA Reg. No. 707-128 are not substantially similar. The registrant needs to cite or submit new data for Guideline Series 63, Physical and Chemical Properties of the product.
2. An adequate enforcement analytical method for the active ingredients of this product is found in MRID # 449079-02. The study title is "Determination of 2-methyl-4-isothiazolin-3-one and 5-chloro-2-methyl-4-isothiazolin-3-one in X-CIDE 207", study identification GLP-0031, study director W. Matlach, dated 6/28/99. In this study, standards and samples were analyzed for active ingredients 5-chloro-2-methyl-3-(2H)-isothiazolone and 2-methyl-3-(2H)-isothiazolone by HPLC/UV. The method was validated (precision) prior to analysis. This method is acceptable and will support the reregistration of the subject product.

3. The submitted product's CSF, a basic formulation dated 09/JUL/97, is not acceptable for reregistration. Certified limits for the inert ingredient [REDACTED] must be provided. This is a requirement as per 40 CFR 158.175 (a)(2). The proposed certified limits for the active ingredients are acceptable and are within the standard limits of 40 CFR 158.175(b)(2). The nominal concentration of the active ingredients agree with the label claim nominal concentration.
4. The label's ingredient statement is in compliance with the requirements of 40 CFR 156.10(g) and PR Notice 91-2. The storage and disposal statements comply with the requirements of 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3. The proposed label will be reviewed again pending submission of Guideline Series 63, for the physical and chemical property data of the product.

CONCLUSIONS:

Except for Findings 1 and 3, the registrant has satisfied the product chemistry data requirements for the reregistration of X-Cide 207 Industrial Microbicide, EPA Reg. No. 10707-44.