

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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

6/20/2000

#### **MEMORANDUM**

MSMA/DSMA. List B Reregistration Case 2395. PC Codes 013803/013802. SUBJECT:

Product Chemistry Chapter for the Reregistration Eligibility Decision [RED]

Document. DB Barcode D265816.

FROM:

K. Dockter, Chemist

Reregistration Branch 2

Health Effects Division [7509C]

THRU:

6-20-2000 cenile 6/20/2000 Alan Nielsen, Branch Senior Scientist

Reregistration Branch 2

Health Effects Division [7509C]

TO:

Diana Locke, Ph.D., Risk Assessor

Reregistration Branch 2

Health Effects Division [7509C]

Attached is the RED document product chemistry chapter for MSMA [monosodium methanearsonate] / DSMA [disodium methanearsonate]. This chapter was assembled by Dynamac Corporation under supervision of HED. The data assessment has undergone secondary and tertiary review in HED and has been revised to reflect Agency policies. Many product chemistry data requirements remain outstanding.

Attachment: RED Document: Product Chemistry Considerations

cc: List B File, SF, RF, Dockter, S. Kinard, R. Sandvig, A. Lowit, R. Allen, K. Monk; SRRD. RD/I RRB2 MSMA/DSMA RED Team. 7509C:RRB2:Rm712N:57886:KD/kd. MSMA/DSMA.RED [954] = D265816.mem

# METHANEARSONIC ACID (MAA) AND SALTS

#### REREGISTRATION ELIGIBILITY DECISION:

### PRODUCT CHEMISTRY CONSIDERATIONS

Case No. 2395; PC Codes 013802 and 013806

#### DESCRIPTION OF CHEMICAL

Methanearsonic acid and its salts are selective postemergence organic arsenical herbicides registered for use on cotton, nonbearing fruits (including almond, apple, cherry, grapefruit, lemon, lime, orange, peach, pear, pecan, plum/prune, tangerine, walnut), bearing citrus, and noncrop areas (including lawns and ornamental turf). Of the five methanearsonic salts, only the disodium salt (DSMA, PC Code 013802) and the monosodium salt (MSMA, PC Code 013803) are registered for food/feed uses and are being supported for reregistration; there are no active products registered for the MAA octylammonium and dodecylammonium salts (PC Codes 013804 and 013805), and there are no registered food/feed uses for the MAA calcium salt (CAMA, PC Code 013806). Reregistration of DSMA and MSMA is being supported by the MAA Research Task Force Three, which consists of APC Holding Company, GB Biosciences (formerly ISK Biotech) Corporation, and Luxembourg-Pamol, Inc.

**DSMA MSMA Empirical Formula:** CH<sub>4</sub>AsNaO<sub>3</sub> **Empirical Formula:** CH<sub>2</sub>AsNa<sub>2</sub>O<sub>3</sub> Molecular Weight: 161.94 Molecular Weight: 183.92 CAS Registry No.: 2163-80-6 CAS Registry No.: 144-21-8 PC Code: 013803 013802 PC Code:

#### IDENTIFICATION OF ACTIVE INGREDIENT

DSMA is a white crystalline solid with a melting point >300 C, density of 1.04 g/mL, vapor pressure of 1 x  $10^{-7}$  mm Hg, and octanol/water partition coefficient (log  $P_{ow}$ ) of <1 at 25 C. DSMA is soluble in water at 34.1 g/100 mL, and is soluble in methanol (26 g/100 mL) and hexane (0.0025 g/100 mL).

MSMA is a white crystalline solid with a melting point of 116-121 C, density of 1.65 g/mL, vapor pressure of 1 x  $10^{-5}$  Pa, and octanol/water partition coefficient (log  $P_{ow}$ ) of <1 at 25 C. MSMA is soluble in water at 104 g/100 mL, is soluble in methanol (16 g/100 mL), and has limited solubility in hexane (0.005 g/100 mL) at 25 C.

#### MANUFACTURING-USE PRODUCTS

A search of the Reference Files System (REFS) conducted 1/17/00 identified one registered manufacturing-use product (MP) under PC Code 013802 (DSMA), the GB Biosciences Corporation 81% formulation intermediate (FI), EPA Reg. No. 50534-39, and one registered MP under PC Code 013803 (MSMA), the GB Biosciences Corporation 59% technical, EPA Reg. No. 50534-47. The 81% DSMA FI is repackaged from an EPA-registered product. In addition, Luxembourg-Pamol and APC Holdings have registered DSMA and MSMA end-use products that are produced by integrated systems. Because the methanearsonic acid salts are List B chemicals, only the Luxembourg-Pamol, APC Holdings, and GB Biosciences DSMA and MSMA technical grade active ingredients [TGAIs] and the GB Biosciences 59% MSMA technical [T] are subject to a reregistration eligibility decision.

### REGULATORY BACKGROUND

DSMA and MSMA were the subject of the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger. Additional product chemistry data were required for DSMA and MSMA products produced by Luxembourg-Pamol, APC Holdings, and GB Biosciences.

The current status of the product chemistry data requirements for the DSMA and MSMA TGAIs and MPs is presented in the attached data summary tables. Refer to these tables for a listing of the outstanding product chemistry data requirements.

### **CONCLUSIONS**

Pertinent product chemistry data requirements remain unfulfilled for the DSMA and MSMA TGAIs. Additional data are required for: (i) the Luxembourg-Pamol DSMA TGAI concerning discussion of the formation of impurities, stability, and UV/visible absorption (OPPTS 830.1670, 6313, and 7050); (ii) the APC Holdings DSMA TGAI concerning stability and UV/visible absorption (OPPTS 830.6313, and 7050); (iii) the Luxembourg-Pamol MSMA TGAI concerning description of the materials used to produce the product and UV/visible absorption (OPPTS 830.1600 and 7050); and (iv) the APC Holdings and GB Biosciences MSMA TGAIs concerning UV/visible absorption (OPPTS 830.7050). Since the GB Biosciences 81% DSMA FI is repackaged from an EPA-registered product, all product chemistry data requirements will be satisfied by data for the source product. We note that additional product-specific product chemistry data are required for the GB Biosciences 59% MSMA T concerning color, physical state, odor, pH, and density (OPPTS 830.6302, 6303, 6304, 7000, and 7300). Provided that the registrants submit the data required in the attached data summary tables for the DSMA and MSMA TGAIs, and either certify that the suppliers of beginning materials and the manufacturing processes have not changed since the last comprehensive product chemistry reviews or submit complete updated product chemistry data packages, HED has no objections to the reregistration of DSMA and MSMA with respect to product chemistry data requirements.

Case Name: Methanearsonic acid salts Registrant: Luxembourg-Pamol, Inc.

Product(s): DSMA TGAI

Guideline Number	Requirement	Are Data Requirements Fulfilled? <sup>1</sup>	MRID Number <sup>2</sup>
830.1550	Product identity and composition	N/A <sup>3</sup>	
830,1600	Description of materials used to produce the product	Y	42388301 4, 44150401 5
830.1620	Description of production process	Y	42388301 4, 44150401 5
830.1670	Discussion of formation of impurities	N 6	42388301 4
830.1700	Preliminary analysis	Υ.	42388302 4, 44150401 5
830.1750	Certified limits	N/A 3	,
830.1800	Enforcement analytical method	N/A <sup>3</sup>	医乳光系列 化铁电路罐
830.6302	Color	Y	42451102 7
830.6303	Physical state	Y	42451102
830.6304	Odor	<b>Y</b> .	42451102 <sup>7</sup>
830.6313	Stability to normal and elevated temperatures, metals,	N <sup>8</sup>	41976203 <sup>9</sup>
	and metal ions		
830,7000	pH	Y	41982002 10
830.7050	UV/Visible absorption	NII	
830,7200	Melting point/melting range	Y	41982001 12
830.7220	Boiling point/boiling range	N/A 13	
830.7300	Density/relative density/bulk density	Ÿ	42451102 14
830.7370	Dissociation constants in water	Υ	41976201 12
830.7550	Partition coefficient (n-octanol/water), shake flask method	Y	41976202 12
830.7840	Water solubility: column elution method; shake flask method	Y	416025027
830.7950	Vapor pressure	Y	42120701 4

<sup>1</sup> Y = Yes; N = No; N/A = Not Applicable.

<sup>&</sup>lt;sup>2</sup> The bolded reference was determined to be acceptable for Phase 5 review under the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger, and was reviewed as noted; all other references were reviewed as noted.

<sup>&</sup>lt;sup>3</sup> Data are not required for the TGAI.

<sup>&</sup>lt;sup>4</sup> CBRS Nos. 9143, 10156, and 10216, D172598, D180025, and D180715, 2/8/93, F. Toghrol.

<sup>&</sup>lt;sup>5</sup> D265640, currently under review.

<sup>&</sup>lt;sup>6</sup> A discussion is required concerning the possible formation of impurities resulting from the composition of each

starting material and its impurities, and from side reactions which may occur.

<sup>&</sup>lt;sup>7</sup> D235020, 5/17/99, K. Dockter.

Stability data must be generated using solid DSMA TGAI; analytical data demonstrating the stability of the TGAI to metals and metal ions are required.

<sup>9</sup> CBRS No. 8526, D167786, 7/6/92, F. Toghrol.

<sup>&</sup>lt;sup>10</sup> CBRS No. 8473, D168029, 7/6/92, F. Toghrol.

<sup>&</sup>quot;The OPPTS Series 830, Product Properties Test Guidelines require data pertaining to UV/visible absorption for the PAI.

<sup>12</sup> CBRS No. 8810, D170296, 1/13/92, S. Funk.

<sup>&</sup>lt;sup>13</sup> Data are not required because the TGAI is a solid at room temperature.

<sup>14</sup> CBRS No. 10542, D182275, 10/27/92, A. Aikens.

Case Name: Methanearsonic acid salts Registrant: APC Holdings, Inc. Product(s): DSMA TGAI

		Are Data	
Guideline Number	Requirement	Requirements Fulfilled? 1	MRID Number 2
830.1550	Product identity and composition	N/A 3	
830,1600	Description of materials used to produce the product	Y	42361001 4
830.1620	Description of production process	Y	42361001 4
830.1670	Discussion of formation of impurities	Y	42053701 5
830,1700	Preliminary analysis	Y	42053702 5
830,1750		N/A 3	
830.1800	Enforcement analytical method	N/A 3	
830.6302	Color	Y	42451102 7
830.6303	Physical state	<b>Y</b>	42451102 <sup>7</sup>
830.6304	Odor	Y	42451102 <sup>7</sup>
830.6313	Stability to normal and elevated temperatures, metals,	N 8	41976203°
	and metal ions		
830.7000	р <del>Н</del>	$\mathbf{Y}^{'}$	41982002 10
830.7050	UV/Visible absorption	N ii	
830.7200	Melting point/melting range	Ÿ	41982001 12
830.7220	Boiling point/boiling range	N/A B	
830.7300	Density/relative density/bulk density	Y	42451102 14
830.7370	Dissociation constants in water	<b>Y</b>	41976201 12
830.7550	Partition coefficient (n-octanol/water), shake flask method	Y	41976202 12
830.7840	Water solubility: column elution method; shake flask method	Y	41602502 7
830.7950	Vapor pressure	Y	42120701 4

 $<sup>^{1}</sup>$  Y = Yes; N = No; N/A = Not Applicable.

<sup>&</sup>lt;sup>2</sup> The **bolded** reference was determined to be acceptable for Phase 5 review under the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger, and was reviewed as noted; all other references were reviewed as noted.

<sup>&</sup>lt;sup>3</sup> Data are not required for the TGAI.

<sup>&</sup>lt;sup>4</sup> CBRS Nos. 9143, 10156, and 10216, D172598, D180025, and D180715, 2/8/93, F. Toghrol.

<sup>&</sup>lt;sup>5</sup> Addendum to CBRS No. 8916, D170574, 3/11/92, S. Funk.

<sup>6</sup> CBRS No. 8916, D170574, 1/13/92, S. Funk.

- <sup>7</sup> D235020, 5/17/99, K. Dockter.
- <sup>8</sup> Stability data must be generated using solid DSMA TGAI; analytical data demonstrating the stability of the TGAI to metals and metal ions are required.
- 9 CBRS No. 8526, D167786, 7/6/92, F. Toghrol.
- 10 CBRS No. 8473, D168029, 7/6/92, F. Toghrol.
- <sup>11</sup> The OPPTS Series 830, Product Properties Test Guidelines require data pertaining to UV/visible absorption for the PAI.
- 12 CBRS No. 8810, D170296, 1/13/92, S. Funk.
- 13 Data are not required because the TGAI is a solid at room temperature.
- 14 CBRS No. 10542, D182275, 10/27/92, A. Aikens.

Case Name: Methanearsonic acid salts Registrant: GB Biosciences Corporation

Product(s): 81% DSMA FI (EPA Reg. No. 50534-39)

0.31.15.2		Are Data Requirements	
Guideline Number	Requirement	Fulfilled? 1	MRID Number <sup>2</sup>
830.1550	Product identity and composition	Y	42051902, CSF 9/23/91
830.1600	Description of materials used to produce the product	N/A	
830,1620	Description of production process	N/A	
830.1670	Discussion of formation of impurities	N/A	
830.1700	Preliminary analysis	N/A	
830.1750		Y 3	42051902, CSF 9/23/91
830,1800	Enforcement analytical method	N/A	•
830.6302	Color	N/A	*
830.6303	Physical state	N/A	
830.6304	Odor	N/A	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	N/A	
830,7000	рН	N/A	er en
830.7050	UV/Visible absorption	N/A	
830.7200	Melting point/melting range	N/A	
830.7220	Boiling point/boiling range	N/A	
830,7300	Density/relative density/bulk density	N/A	
830.7370	Dissociation constants in water	N/A	
830.7550	Partition coefficient (n-octanol/water), shake flask method	N/A	-
830.7840	Water solubility: column elution method; shake flask method	N/A	
830.7950	Vapor pressure	N/A	

<sup>&</sup>lt;sup>1</sup> Y = Yes; N = No; N/A = Not Applicable. The GB Biosciences 81% DSMA FI is repackaged from an EPA-registered product and all product chemistry data requirements will be satisfied by data for the source product.



<sup>&</sup>lt;sup>2</sup> The MRID and CSF references were reviewed by the Registration Division (RD), D170330, 12/26/91, M. Getz.

<sup>&</sup>lt;sup>3</sup> The CSF has been determined acceptable by RD; however, we note that the nominal concentration and certified limits listed on the CSF should be based on the actual amount of the active ingredient in the product.

Case Name: Methanearsonic acid salts Registrant: Luxembourg-Pamol, Inc.

Product(s): MSMA TGAI

Guideline Number	Requirement	Are Data Requirements Fulfilled? 1	MRID Number <sup>2</sup>
830.1550	Product identity and composition	N/A 3	
830.1600	Description of materials used to produce the product	N <sup>4</sup>	41602701 5, 42387801 5
830.1620	Description of production process	Y	41602701 5, 42387801 5
830.1670	Discussion of formation of impurities	Ÿ	41602701 5, 42387801 5
830.1700	Preliminary analysis	Y	42387802 <sup>6</sup>
830.1750	Certified limits	N/A 3	
830.1800	Enforcement analytical method	N/A <sup>3</sup>	
830.6302	Color	Y	41610001 5, 42451101 7
830.6303	Physical state	Ý	41610001 5, 42451101 7
830.6304	Odor	Y	41610001 5, 42451101 7
830.6313	Stability to normal and elevated temperatures, metals,	Y	41610001 5, 42378601 8
* 1	and metal ions		
830.7000	pΗ	Ÿ	41610001 5, 42378601 8
830.7050	UV/Visible absorption	N <sup>9</sup>	
830.7200	Melting point/melting range	Y	41789501 10
830.7220	Boiling point/boiling range	N/A 11	
830.7300	Density/relative density/bulk density	Y	424511017
830.7370	Dissociation constants in water	Y	41610001 5
830.7550	Partition coefficient (n-octanol/water), shake flask method	N/A 12	
830.7840	Water solubility: column elution method; shake flask method		41610001
830.7950	Vapor pressure	Y	41610001 5, 41651901 13

<sup>1</sup> Y = Yes; N = No; N/A = Not Applicable.

<sup>&</sup>lt;sup>2</sup> Bolded references were determined to be acceptable for Phase 5 review under the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger, and were reviewed as noted; all other references were reviewed as noted.

<sup>&</sup>lt;sup>3</sup> Data are not required for the TGAL.

<sup>&</sup>lt;sup>4</sup> Information is required concerning the sources and specifications of the starting materials.

<sup>&</sup>lt;sup>5</sup> D235020, 5/17/99, K. Dockter.

<sup>&</sup>lt;sup>6</sup> CBRS No. 10527, D182420, 2/9/93, F. Toghrol.

<sup>7</sup> CBRS No. 10535, D182274, 10/26/92, D. McNeilly.

8 CBRS No. 10254, D180533, 2/22/93, A. Aikens.

<sup>9</sup> The OPPTS Series 830, Product Properties Test Guidelines require data pertaining to UV/visible absorption for the PAI.

10 CBRS No. 8155, D165463, 11/20/91, F. Toghrol.

11 Data are not required because the TGAI is a solid at room temperature.

12 Data are not required because MSMA is polar.

13 CBRS No. 8811, D170285, 1/13/92, S. Funk.

Case Name: Methanearsonic acid salts Registrant: APC Holdings, Inc. Product(s): MSMA TGAI

		Are Data	
Guideline Number	Requirement	Requirements Fulfilled? 1	MRID Number <sup>2</sup>
830,1550	Product identity and composition	N/A 3	
830,1600	Description of materials used to produce the product	Y	41702001 4
830,1620	Description of production process	Y ,	41702001 4
830.1670	Discussion of formation of impurities	Y	42474101 4
830,1700	Preliminary analysis	<b>Y</b>	41702002 4, 42474101 4
830.1750	Certified limits	N/A <sup>3</sup>	
830,1800	Enforcement analytical method	N/A 3	
830.6302	Color	Y	41610001 5
830.6303	Physical state	<b>Y</b> 4, 4	41610001 <sup>5</sup>
830.6304	Odor	Y	41610001 5
830.6313	Stability to normal and elevated temperatures, metals,	Y	41610001 5, 42378601 6
	and metal ions		
830.7000	pH	Y	41610001 5, 42378601 6
830.7050	UV/Visible absorption	N <sup>7</sup>	
830.7200	Melting point/melting range	Y	41789501 8
830.7220	Boiling point/boiling range	N/A 9	
830.7300	Density/relative density/bulk density	Y	42451101 <sup>10</sup>
830.7370	Dissociation constants in water	Y	41610001 <sup>5</sup>
830.7550	Partition coefficient (n-octanol/water), shake flask method	N/A <sup>11</sup>	
830.7840	Water solubility: column elution method; shake flask method		41610001
830.7950	Vapor pressure	Y	41610001 5, 41651901 12

 $<sup>^{1}</sup>$  Y = Yes;  $\tilde{N}$  = No; N/A = Not Applicable.

<sup>&</sup>lt;sup>2</sup> Bolded references were determined to be acceptable for Phase 5 review under the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger, and were reviewed as noted; all other references were reviewed as noted.

<sup>&</sup>lt;sup>3</sup> Data are not required for the TGAI.

<sup>&</sup>lt;sup>4</sup> CBRS No. 10622, D182871, 2/25/93, F. Toghrol.

<sup>&</sup>lt;sup>5</sup> D235020, 5/17/99, K. Dockter.

<sup>6</sup> CBRS No. 10254, D180533, 2/22/93, A. Aikens.

<sup>7</sup> The OPPTS Series 830, Product Properties Test Guidelines require data pertaining to UV/visible absorption for the PAI.

<sup>8</sup> CBRS No. 8155, D165463, 11/20/91, F. Toghrol.

9 Data are not required because the TGAI is a solid at room temperature.

<sup>10</sup> CBRS No. 10535, D182274, 10/26/92, D. McNeilly.

<sup>11</sup> Data are not required because MSMA is polar.

12 CBRS No. 8811, D170285, 1/13/92, S. Funk.

Case Name: Methanearsonic acid salts Registrant: GB Biosciences Corporation

Product(s): 59% MSMA T (EPA Reg. No. 50534-47)

		Are Data	
Guideline		Requirements	
Number	Requirement	Fulfilled? 1	MRID Number <sup>2</sup>
830.1550	Product identity and composition	Y	<u>42153501</u>
830.1600	Description of materials used to produce the product	Y	42081201 <sup>3</sup>
830.1620	Description of production process	Y	42081201 3
830.1670	Discussion of formation of impurities	Y	<u>41608101</u>
830.1700	Preliminary analysis	Y	<u>41608104</u>
830.1750	Certified limits	N	NG
830.1800	Enforcement analytical method	il, <b>N</b> eresti	NG
830.6302	Color	N <sup>4</sup>	41610 <b>001</b> 5
830.6303	Physical state	N.4	41610001 5
830.6304	Odor	N 4	41610001 5
830.6313	Stability to normal and elevated temperatures, metals,	Y	41610001 5, 42378601 5
***	and metal ions		
830.7000	рН	N 4	41610001 5, 42378601 6
830.7050	UV/Visible absorption	N 7	
830.7200	Melting point/melting range	Y	41789501 8
830.7220	Boiling point/boiling range	Y	41608107
830.7300	Density/relative density/bulk density	N 4	424511019
830.7370	Dissociation constants in water	<b>Y</b> :	41610001 5
830.7550	Partition coefficient (n-octanol/water), shake flask	N/A 10	
	method		
830.7840	Water solubility: column elution method; shake flask		41610001
	method		
830.7950	Vapor pressure	Y	41610001 5, 41651901 11

<sup>1</sup> Y = Yes; N = No; N/A = Not Applicable; NG = Not Given.

<sup>&</sup>lt;sup>2</sup> Bolded references were determined to be acceptable for Phase 5 review under the Methanearsonic Acid and Salts Phase 4 Reviews dated 3/28/91 by C. Olinger, and were reviewed as noted; all other references were reviewed as noted. [Note to secondary reviewer: underlined references were cited as reviewed in the data summary table of CBRS No. 10254, D180533, 2/22/93, A. Aikens. Although CBRS No. 10254 was originally reviewed by Dynamac, the data summary table was updated by A. Aikens, and the memoranda reviewing the underlined references were unavailable to Dynamac.]

<sup>&</sup>lt;sup>3</sup> CBRS No. 8931, D171424, 1/13/92, S. Funk.

<sup>&</sup>lt;sup>4</sup> Data requirements for the TGAI are satisfied; however, data concerning the 59% T manufacturing-use product are required.

- <sup>5</sup> D235020, 5/17/99, K. Dockter.
- 6 CBRS No. 10254, D180533, 2/22/93, A. Aikens.
- <sup>7</sup> The OPPTS Series 830, Product Properties Test Guidelines require data pertaining to UV/visible absorption for the PAI.
- 8 CBRS No. 8155, D165463, 11/20/91, F. Toghrol.
- 9 CBRS No. 10535, D182274, 10/26/92, D. McNeilly.
- 10 Data are not required because MSMA is polar.
- 11 CBRS No. 8811, D170285, 1/13/92, S. Funk.

### AGENCY MEMORANDA CITED IN THIS DOCUMENT

CBRS No(s):

8155

DP Barcode(s): D165463

Subject:

Monosodium methanearsonate (MSMA): (ID# 013803-042519);

Luxembourg-Pamol, Inc.: Response to MSMA (Case No. 2395, Chemical No.

13803) Phase 4 Reregistration Product Chemistry Data Requirements

(Regarding Melting Point Guideline #63-5).

From:

F. Toghrol

To: Dated: B. Briscoe 11/20/91

MRID(s):

41789501

CBRS No(s):

RD Memorandum

DP Barcode(s):

D170330

Subject:

Product Chemistry Review of ISK Biotech Disodium Methanearsonate (EPA

Reg. No. 50534-39); Action Code 345.

From:

M. Getz

To:

C. Giles-Parker

Dated:

12/26/91

MRID(s):

42051902

CBRS No(s):

8931

DP Barcode(s):

D171424

Subject:

Reregistration of Monosodium Methanearsonate. ISK Biotech Corp. Product

Chemistry.

From:

S. Funk

To:

B. Crompton

Dated:

1/13/92

MRID(s):

42081201

CBRS No(s):

8810

DP Barcode(s):

D170296

Subject:

Reregistration of Disodium Methanearsonate. Luxembourg-Pamol, Inc.

Response to Phase 4 Review.

From:

S. Funk

To:

B. Crompton

Dated:

1/13/92

MRID(s):

41982001, 41976201, and 41976202

CBRS No(s):

8811

DP Barcode(s):

D170285

Subject:

Reregistration of Monosodium Methanearsonate. Luxembourg-Pamol, Inc.

Response to Phase 4 Review of Product Chemistry.

From:

S. Funk

To:

B. Crompton

Dated:

1/13/92

MRID(s):

41651901

CBRS No(s):

8916

DP Barcode(s):

D170574

Subject:

Reregistration of Disodium Methanearsonate. APC Holdings (Inter-Ag)

Response to Phase 4 Review of Product Chemistry.

From:

S. Funk

To:

B. Crompton

Dated:

1/13/92

MRID(s):

42053701 and 42053702

CBRS No(s):

8916 (Addendum)

DP Barcode(s):

D170574 (Addendum)

Subject:

Reregistration of Disodium Methanearsonate (DSMA). APC Holdings (Inter-

Ag) Response to Phase 4 Review of Product Chemistry. Addendum to

Memorandum of 1/13/92.

From:

S. Funk

To:

B. Crompton

Dated:

3/11/92

MRID(s):

42053701

CBRS No(s):

8473

DP Barcode(s):

D168029

Subject:

Disodium methanearsonate (DSMA): (ID# 013802-042519); Luxembourg-

Pamol, Inc.: Response to DSMA (Case No. 2395, Chemical No. 013802) Reregistration Product Chemistry Data Requirements (Regarding Melting

Point & pH Guideline # 63-5 & 63-12).

From:

F. Toghrol

To:

B. Briscoe

Dated:

7/6/92

MRID(s):

41982002

CBRS No(s):

8526

DP Barcode(s):

D167786

Subject:

Disodium methanearsonate (DSMA): (ID# 013802-042519); Luxembourg-Pamol, Inc. Response to DSMA (Case No. 2395, Chemical No. 013802) Reregistration Product Chemistry Data Requirements (Regarding Dissociation Constant, Octanol/Water Partition Coefficient, and Stability (Guideline # 63-

10, 63-11, & 63-13)).

From:

F. Toghrol

To:

B. Briscoe

Dated:

7/6/92

MRID(s):

41976203

CBRS No(s):

10535

DP Barcode(s):

D182274

Subject:

Reregistration of Monosodium Methanearsonate (MSMA). Luxembourg-

Pamol, Inc. Product Chemistry {Guideline 63}. (Case No. 2395, Chemical

No. 13803).

From:

D. McNeilly

To:

B. Crompton

Dated:

10/26/92

MRID(s):

42451101

CBRS No(s):

10542

DP Barcode(s):

D182275

Subject:

DSMA (Disodium Methanearsonate) Reregistration. Product Chemistry

Guideline 63-7: Bulk Density or Specific Gravity. Response to Phase IV

Review and 63 Series Status Report.

From:

A. Aikens

To:

B. Briscoe/B. Crompton

Dated:

10/27/92

MRID(s):

42451102

CBRS No(s):

9143, 10156, and 10216

DP Barcode(s):

D172598, D180025, and D180715

Subject:

DSMA Reregistration: a List B Chemical (Chemical No.: 013802; Case No.

2395). Registrants Response to the DSMA Product Chemistry Data

Requirements.

From:

F. Toghrol

To:

L. Rossi/B. Briscoe

Dated:

2/8/93

MRID(s):

42388301, 42388302, 42361001, and 42120701

CBRS No(s):

10527

DP Barcode(s):

D182420

Subject:

Monosodium methanearsonate (MSMA): Luxembourg-Pamol, Inc. Response

to MSMA (Case No. 2395; Chemical No. 013803) Reregistration Product Chemistry Data Requirements (Regarding Guideline # 61-1, 61-2(a), & 62-1 to

62-3).

From:

F. Toghrol

To:

B. Briscoe

Dated:

2/9/93

MRID(s):

42387801 and 42387802

CBRS No(s):

10254

DP Barcode(s):

D180533

Subject:

MSMA (Methanearsonic Acid and Salts): MAA Research Task Force Three.

Response to the Phase IV Review dated (3/28/91): Product Chemistry

Guidelines 63-12 and 63-13. (Chemical No. 013803)

From:

A. Aikens

To:

B. Briscoe/B. Crompton

Dated:

2/22/93

MRID(s):

42378601

CBRS No(s):

10622

DP Barcode(s):

D182871

Subject:

Monosodium methanearsonate (MSMA) Reregistration: a List B Chemical.

APC Holdings, Inc. Response to MSMA (Case No. 2395, Chemical No. 013803) Reregistration Product Chemistry Data Requirements (Regarding

Guideline # 61-2 & 62-1).

From:

F. Toghrol

To:

B. Briscoe

Dated:

2/25/93

18

MRID(s):

41702001, 41702002, and 42474101

DP Barcode(s):

D235020

Subject:

MSMA and DSMA; EPA Reg. Nos. 42519-1 and -7. PC Codes 013801 and

013802. List B Reregistration Case 2395. Supplemental Product Chemistry.

From:

K. Dockter

To:

L. Werrell

Dated:

5/17/99

MRID(s):

41602502, 41602701, 41610001, 42387801, and 42451102

DP Barcode(s):

D265640

Subject:

Product Chemistry Review of Luxembourg-Pamol DSMA 81% EP; Revised

Manufacturing Process.

From:

To:

Dated:

Currently under review

MRID(s):

44150401

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