

CBRS TRANSMITTAL SHEET FOR PHASE 4 REVIEWS

Transmitted to HED on 8/31/90

DEB No. 6974

Case name: Methanearsonic acid and salts

Chemical Name(s): Calcium methanearsonate (CAMA)

Data submitter(s): Vineland Chemical Company

CRM: Betty Crompton

Phone #: 308-8067

Issues/flags:

This action contains a request for a DATA WAIVER ( )  
TIME EXTENSION ( )  
ALTERED/DELETED USE ( )

Other: LUIS output dated 2/16/91 and product label 2853-4 were used as sources of use information. The LUIS output lists cotton as a use site on product 2853-4. The label with this EPA Reg. No. obtained from the Label Library did not list cotton as a use site, only grasses.

Branch: CBRS, Phase 4 Review Team

Reviewed by: Christine L. Olinger CLO Date: 3-26-91

Approvals:

Section Head: Andrew R. Rathman *ARR* Date: 3/27/91

Branch Approval: Edward Zager *Edward Zager* Date: 3/28/91

cc: CLOlinger, List B File, Circ., B. Grim (EFED), C. Furlow (FOD/PIB), RF

Response, by Guideline
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Guideline #: 171-3 Description: Directions for Use

Is requirement applicable? (Y/N): Y

Discussion: In order for the use of the CAMA to be considered a non-food use product labels (for those products which may be used on grasses) should be modified as described below.

Data Gap: Product labels (for those products which may be used on grasses, including 2853-4) should contain the following statement: "Do not use on grass grown for seed. Do not allow livestock to graze on treated areas."

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Guideline #: 171-4(a) Description: Nature of residue - plants

Guideline #: 171-4(b) Description: Nature of residue - animals

Guideline #: 171-4(c) Description: Res. analyt. method - plant

Guideline #: 171-4(d) Description: Res. anal. method - animals

Guideline #: 171-4(e) Description: Storage stability

Guideline #: 171-4(f) Description: Mag. res. - potable water

Guideline #: 171-4(g) Description: Magnitude residue - fish

Guideline #: 171-4(h) Description: Mag. res. - irrigated crop

Guideline #: 171-4(i) Description: Mag. res. - food handling

Guideline #: 171-4(j) Description: Mag. meat/milk/poultry/eggs

Guideline #: 171-4(k/l) Description: Crop field trials/process

Are requirements applicable? (Y/N): N - see discussion

Discussion: The use of CAMA will be considered a non-food use once product labels have been modified as described above. Therefore these studies will not be required.

Data Gap: None.

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**PRODUCT CHEMISTRY**

Case Name: Methanearsonic acid and salts  
Chemical Name(s): Calcium Methanearsonate (CAMA)  
Registrant: Vineland Chemical Company

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
61-1	Y	N/A	Y <sup>a</sup>	N/A
61-2 (a)	Y	N/A	Y <sup>a</sup>	N/A
61-2 (b)	Y	N/A	Y <sup>a</sup>	N/A
62-1	Y	N/A	Y <sup>a</sup>	N/A
62-2	Y	N/A	Y <sup>a</sup>	N/A
62-3	Y	N/A	Y <sup>a</sup>	N/A
63-2	Y	N/A	Y <sup>a,b</sup>	N/A
63-3	Y	N/A	Y <sup>a,b</sup>	N/A
63-4	Y	N/A	Y <sup>a,b</sup>	N/A
63-5	Y	N/A	Y <sup>a,b</sup>	N/A
63-6	Y	N/A	Y <sup>a,b</sup>	N/A
63-7	Y	N/A	Y <sup>a,b</sup>	N/A
63-8	Y	N/A	Y <sup>a,b</sup>	N/A
63-9	Y	N/A	Y <sup>a,b</sup>	N/A
63-10	Y	N/A	Y <sup>a,b</sup>	N/A
63-11	N	N/A	N/A	N/A
63-12	Y	N/A	Y <sup>a,b</sup>	N/A
63-13	Y	N/A	Y <sup>a,b</sup>	N/A

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

<sup>a</sup>Registrant has committed to conduct the study in either their Phase 2 or Phase 3 response. The registrant is advised that product chemistry data must be developed for each salt, and data may not be translated from one salt to another.

<sup>b</sup>As stated previously in the Phase 2 response, regardless of whether or not the 51% aqueous solution is considered to be a manufacturing-use product, a solid PAI or TGAI equivalent must be isolated for purposes of determination of all physical/chemical properties of each salt.