List B File

Case No.: 2395
Chemical No(s).: 13802

3-28-91

CBRS TRANSMITTAL SHEET FOR PHASE 4 REVIEWS

Transmitted to HED on 8/31/90 DEB Nos. 6974, 7462, 7463
Case name: Methanearsonic acid and salts
Chemical Name(s): Disodium methanearsonate (DSMA)
Data submitter(s): APC Holdings (Formerly Inter-Ag)

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 labels were used as sources of use information.

Branch: CBRS, Phase 4 Review Team
Reviewed by: Christine L. Olinger CLO Date: 3-26-91

CLO 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

Guideline #: 171-3 Description: Directions for Use
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Product labels require several modifications as outlined below under "Data Gap".
Data Gap: All product labels with cotton as a use site must prohibit feeding treated foliage to livestock. For citrus and non-bearing orchard crop use, a restriction prohibiting livestock grazing in treated orchards must be on the label. A pre-harvest interval for bearing citrus uses should be added to the label. All product labels with cotton and/or citrus as a use site should state "No more than three applications of MSMA or DMSA may be made per growing season". All product labels should specify a maximum number of applications and a retreatment interval. These parameters must reflect those used in the crop field trials.

Guideline #: 171-4(a) Description: Nature of residue - plants
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar.
Data Gap: The registrant must provide two new plant metabolism studies. Monosodium methanearsonate labelled in a non-labile part of the molecule should be applied to cotton and a citrus fruit reflecting the currently registered use. The specific activity and/or application rate should be high enough to allow for adequate identification of the metabolites/ degradates. The plant material from the metabolism study should be tested using the data collection method(s) and enforcement analytical method(s).

Guideline #: 171-4(b) Description: Nature of residue - animals
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate

(MSMA) data to DSMA since the use patterns and chemistry are very similar.

Data Gap: The registrant must provide poultry and ruminant metabolism studies. Monosodium methanearsonate labelled in a non-labile part of the molecule should be fed to the livestock for a minimum of three days. Orally treated test animals must be sacrificed within 24 hours of the final dose. The dose administered and the specific activity should be high enough to allow for adequate identification of the metabolites/ degradates. The tissues from the metabolism study should be tested using the data collection method(s) and enforcement analytical method(s).

Guideline #: 171-4(c) Description: Res. analyt. method - plant
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A

Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar. Multi-residue method testing will not be required since recovery of monosodium methanearsonate through any of the protocols is unlikely.

Data Gap: The registrant must submit data collection and regulatory analytical method(s) for the determination of monosodium methanearsonate in/on plant matrices. If new metabolites (which require regulation) are found in the new plant metabolism studies, then analytical method(s) must be developed for them as well. Any regulatory methods submitted will require an independent method validation as described in PR Notice 88-5 (July 15, 1988).

Guideline #: 171-4(d) Description: Res. anal. method - animals
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A

Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar. Multi-residue method testing will not be required since recovery of monosodium methanearsonate through any of the protocols is unlikely.

Data Gap: The registrant must submit data collection and regulatory analytical method(s) for the determination of monosodium methanearsonate in/on

animal commodities. If new metabolites (which require regulation) are found in the new animal metabolism studies, then analytical method(s) must be developed for them as well. Any regulatory methods submitted will require an independent method validation as described in PR Notice 88-5 (July 15, 1988).

Guideline #: 171-4(e) Description: Storage stability
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar.
Data Gap: Storage stability studies must be conducted on all crops and processed products for which a field trial and/or processing study has been (or will be) conducted, as well as representative livestock commodities. Use of field-weathered samples is strongly recommended. Storage conditions must reflect the storage conditions of the treated samples (from the field trial and processing studies) with respect to temperature, length of storage, containers, lighting, etc. If there are any metabolites and/or degradates included in the tolerance expressions, then they must be tested as well. The chosen intervals must allow for unforeseen delays in sample storage.

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
Are requirements applicable? (Y/N): N

Guideline #: 171-4(j) Description: Mag. meat/milk/poultry/eggs
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar.
Data Gap: Monosodium methanearsonate must be fed to dairy cattle and poultry for a minimum of 28 days or until residues plateau in the milk or eggs, whichever is

longer. Following oral treatment, test animals should be sacrificed within 24 hours of the final dose. Feeding levels should be determined based on the latest crop residue data generated or to be generated. Animals should be fed at levels of 1X, 3X, and 10X the maximum dietary burden. When determining the feeding levels the registrant should consider the maximum crop residue levels possible and the dietary burden based on Table II Subdivision O - Residue Chemistry Guidelines.

Guideline #: 171-4(k/l) Description: Cotton field trials/process
Are requirements applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar.
Data Gap: Data depicting residues of monosodium methanearsonate and the regulated metabolites in/on cotton must be submitted. A representative aqueous formulation must be applied at the maximum label rate, the maximum number of applications, the minimum retreatment interval, and the minimum PHI. These parameters are specified in Table 1. The use of aerial and ground equipment must be represented in separate tests. The states in which the tests must be conducted are also listed in Table 1.

A processing study must be conducted for cottonseed. Cottonseed bearing detectable residues of the parent and the regulated metabolites should be processed into meal, hulls, soapstock, crude oil, and refined oil to determine the residue concentration or reduction factor(s). If the cottonseed is treated at exaggerated rates equivalent to at least the maximum theoretical concentration factor due to processing and no detectable residues are found on the RAC, then processing studies are not required.

Guideline #: 171-4(k/l) Description: Citrus field trials/process
Are requirements applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has not addressed this use site. CBRS accepts translation of monosodium methanearsonate (MSMA) data to DSMA since the use patterns and chemistry are very similar.

Data Gap: Data depicting residues of monosodium methanearsonate and the regulated metabolites in/on lemons, oranges, and grapefruit must be submitted. A representative aqueous formulation must be applied at the maximum label rate, the maximum number of applications, the minimum retreatment interval, and the minimum PHI. These parameters are listed in Table 1. The use of aerial and ground equipment must be represented in separate tests. The states in which the tests must be conducted are also listed in Table 1.

A processing study must be conducted for a representative citrus fruit. The commodity bearing detectable residues of the parent and the regulated metabolites should be processed into dried pulp, oil, molasses, and juice to determine the residue concentration or reduction factor(s). If the commodity is treated at exaggerated rates equivalent to at least the maximum theoretical concentration factor due to processing and no detectable residues are found on the RAC, then processing studies are not required.

Guideline #: 171-4(k/l) Description: Crop field trials/process
Commodity: Non-bearing Orchard Crops
Is requirement applicable? (Y/N): N - see discussion
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has not addressed this use site. Residue data are not needed if product labels are modified as described below.
Data Gap: Product labels with non-bearing orchard crops as use sites must be modified to include the following statement: "Treated crop may not be harvested within one year of application."

ADDITIONAL COMMENTS:
The registrant is advised to consult the Subdivision O Residue Chemistry Guidelines, the Standard Evaluation Procedures, the Data Reporting Guidelines, and the Phase 3 Technical Guidance concerning conduct of residue chemistry studies. If the registrant has additional concerns they are advised to submit a protocol for CBRS review.

Table 1. Test Parameters for Crop Field Trials

Crop	States[1]	Appl. Rate lb a.i./A	Timing	Equip. A, G, C[2]	Max. No. of Appl.	Retreatment Interval, days	PHI, days
Cotton	TX, CA, AZ, MS, LA	2.0	1)pre-plant or post-plant to cracking; broadcast application	G,A	3	7-21	NS[3]
		1.0	2)post-e 3-6" or 1st squares; broadcast application	G,A			
		2.0	3)post-e 3" to 1st bloom, directed application	G			
Orange	FL, CA	4.0	NS	G	3	NS	NS[4]
Lemon	CA, AZ						
Grapefruit	CA, FL, TX						

[1]If a slash appears between states then either site may be chosen.

[2]A = aerial, G = ground, C = chemigation.

[3]NS = Not specified on product labels.

[4]PHI has not been specified on label. Labels should be amended to reflect PHIs from crop field trials.

PRODUCT CHEMISTRY

Case Name: Methanearsonic acid and salts
Chemical Name(s): Disodium methanearsonate (DSMA)
Registrant: APC Holdings (Formerly Inter-Ag)

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[a]	N/A
61-2(a)	Y	N/A	Y[a]	N/A
61-2(b)	Y	N/A	Y[a]	N/A
62-1	Y	N/A	Y[a]	N/A
62-2	Y	N/A	Y[a]	N/A
62-3	Y	I[b]	Y[b]	I[b]
63-2	Y	Y	N	41602501
63-3	Y	Y	N	41602501
63-4	Y	Y	N	41602501
63-5	Y	N[c]	Y[c]	U[c]
63-6	N	N/A	N/A	N/A
63-7	Y	N[c]	Y[c]	U[c]
63-8	Y	Y	N	41602502
63-9	Y	N/A	Y[a]	N/A
63-10	Y	N/A	Y[a]	N/A
63-11	Y	N/A	Y[a]	N/A
63-12	Y	I[b]	Y[b]	I[b]
63-13	Y	N/A	Y[a]	N/A

Key: Y=yes; N=no; I=a decision cannot be made at this time; S=fully satisfies requirement; P=partially; N/A=not applicable; U=unsatisfactory.

Note to CRM: **Decisions on Physical/Chemical Characteristics (63 Series) are based on data submitted by CCI on behalf of Task Force 3. Based on correspondence submitted with the Phase 3 package (letter from Les Shockey, APC Holdings, to U.S. EPA, 6/20/90) CBRS cannot determine if Vineland Chemical Company and APC Holdings are members in good standing of the Task Force. Despite this fact CBRS based their response for APC Holdings on the Task Force data (with the exception of 63-12, which was specifically cited in the registrants response). If SRRD later determines that this registrant may not cite these data, then the 63 series requirements should be considered data gaps.**

[a]Registrant has committed to conduct the study. The registrant is advised that a solid form of the TGAI or PAI must be used for physical/chemical testing.

[b]The registrant has stated in attached correspondence that a MRID number was provided for each of these studies in their Phase 2 response, but no comment was made by the Agency on the acceptability of these studies. The purpose of the Agency discussion in Phase 2 was not to comment on the acceptability of studies, but only to provide a preliminary decision on proposed data waivers. The registrant has not submitted summaries for either of these studies. Accordingly CBRS cannot comment on the adequacy of these studies. Both guidelines are therefore considered to be Data Gaps by CBRS.

[c]CBRS cannot determine adequacy of study since test method was not reported.

CBRS TRANSMITTAL SHEET FOR PHASE 4 REVIEWS

Transmitted to HED on 8/31/90

DEB Nos. 6974, 7590, 7462, 7463

Case name: Methanearsonic acid and salts
Chemical Name(s): Monosodium methanearsonate (MSMA)
Data submitter(s): APC Holdings (Formerly Inter-Ag)

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 labels were used as sources of use information.

Branch: CBRS, Phase 4 Review Team
Reviewed by: Christine L. Olinger CLO Date: 3-26-91

3/26/91

Approvals:

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

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

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

Response, by Guideline

Guideline #: 171-3 Description: Directions for Use
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Product labels require several modifications as outlined below under "Data Gap".
Data Gap: All product labels with cotton as a use site must prohibit feeding treated foliage to livestock. For citrus and non-bearing orchard crop use, a restriction prohibiting livestock grazing in treated orchards must be on the label. A pre-harvest interval for bearing citrus uses should be added to the label. Product label 7401-185 should specify the permitted use site(s); currently the label states "General Weed Control". All product labels with cotton and/or citrus as a use site should state "No more than three applications of MSMA or DMSA may be made per growing season". All product labels should specify a maximum number of applications and a retreatment interval. These parameters must reflect those used in the crop field trials.

Guideline #: 171-4(a) Description: Nature of residue - plants
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study.
Data Gap: The registrant must provide three new plant metabolism studies. Monosodium methanearsonate labelled in a non-labile part of the molecule should be applied to cotton, a grass, and a citrus fruit reflecting the currently registered use. The specific activity and/or application rate should be high enough to allow for adequate identification of the metabolites/ degradates. The plant material from the metabolism study should be tested using the data collection method(s) and enforcement analytical method(s).

Guideline #: 171-4(b) Description: Nature of residue - animals
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study.
Data Gap: The registrant must provide poultry and ruminant metabolism studies. Monosodium methanearsonate

labelled in a non-labile part of the molecule should be fed to the livestock for a minimum of three days. Orally treated test animals must be sacrificed within 24 hours of the final dose. The dose administered and the specific activity should be high enough to allow for adequate identification of the metabolites/ degradates. The tissues from the metabolism study should be tested using the data collection method(s) and enforcement analytical method(s).

Guideline #: 171-4(c) Description: Res. analyt. method - plant
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. Multi-residue method testing will not be required since recovery of monosodium methanearsonate through any of the protocols is unlikely.
Data Gap: The registrant must submit data collection and regulatory analytical method(s) for the determination of monosodium methanearsonate in/on plant matrices. If new metabolites (which require regulation) are found in the new plant metabolism studies, then analytical method(s) must be developed for them as well. Any regulatory methods submitted will require an independent method validation as described in PR Notice 88-5 (July 15, 1988).

Guideline #: 171-4(d) Description: Res. anal. method - animals
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study. Multi-residue method testing will not be required since recovery of monosodium methanearsonate through any of the protocols is unlikely.
Data Gap: The registrant must submit data collection and regulatory analytical method(s) for the determination of monosodium methanearsonate in/on animal commodities. If new metabolites (which require regulation) are found in the new animal metabolism studies, then analytical method(s) must be developed for them as well. Any regulatory methods submitted will require an independent method validation as described in PR Notice 88-5 (July 15, 1988).

Guideline #: 171-4(e) Description: Storage stability
Is requirement applicable? (Y/N): Y

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Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study.
Data Gap: Storage stability studies must be conducted on all crops and processed products for which a field trial and/or processing study has been (or will be) conducted, as well as representative livestock commodities. Use of field-weathered samples is strongly recommended. Storage conditions must reflect the storage conditions of the treated samples (from the field trial and processing studies) with respect to temperature, length of storage, containers, lighting, etc. If there are any metabolites and/or degradates included in the tolerance expressions, then they must be tested as well. The chosen intervals must allow for unforeseen delays in sample storage.

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
Are requirements applicable? (Y/N): N

Guideline #: 171-4(j) Description: Mag. meat/milk/poultry/eggs
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study.
Data Gap: Monosodium methanearsonate must be fed to dairy cattle and poultry for a minimum of 28 days or until residues plateau in the milk or eggs, whichever is longer. Following oral treatment, test animals should be sacrificed within 24 hours of the final dose. Feeding levels should be determined based on the latest crop residue data generated or to be generated. Animals should be fed at levels of 1X, 3X, and 10X the maximum dietary burden. When determining the feeding levels the registrant should consider the maximum crop residue levels possible and the dietary burden based on Table II Subdivision O - Residue Chemistry Guidelines.

Guideline #: 171-4(k/l) Description: Cotton field trials/process
Are requirements applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has committed to conduct the study.
Data Gap: Data depicting residues of monosodium methanearsonate

and the regulated metabolites in/on cotton must be submitted. A representative aqueous formulation must be applied at the maximum label rate, the maximum number of applications, the minimum retreatment interval, and the minimum PHI. These parameters are specified in Table 1. The use of aerial and ground equipment must be represented in separate tests. The states in which the tests must be conducted are also listed in Table 1.

A processing study must be conducted for cottonseed. Cottonseed bearing detectable residues of the parent and the regulated metabolites should be processed into meal, hulls, soapstock, crude oil, and refined oil to determine the residue concentration or reduction factor(s). If the cottonseed is treated at exaggerated rates equivalent to at least the maximum theoretical concentration factor due to processing and no detectable residues are found on the RAC, then processing studies are not required.

Guideline #: 171-4(k/l) Description: Citrus field trials/process
Are requirements applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has not addressed this use site.
Data Gap: Data depicting residues of monosodium methanearsonate and the regulated metabolites in/on lemons, oranges, and grapefruit must be submitted. A representative aqueous formulation must be applied at the maximum label rate, the maximum number of applications, the minimum retreatment interval, and the minimum PHI. These parameters are listed in Table 1. The use of aerial and ground equipment must be represented in separate tests. The states in which the tests must be conducted are also listed in Table 1.

A processing study must be conducted for a representative citrus fruit. The commodity bearing detectable residues of the parent and the regulated metabolites should be processed into dried pulp, oil, molasses, and juice to determine the residue concentration or reduction factor(s). If the commodity is treated at exaggerated rates equivalent to at least the maximum theoretical concentration factor due to processing and no detectable residues are found on the RAC, then processing studies are not required.

Guideline #: 171-4(k/l) Description: Crop field trials/process
Commodity: Grasses grown for seed
Is requirement applicable? (Y/N): Y
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has not addressed this use site.
Data Gap: Data depicting residues of monosodium methanearsonate and the regulated metabolites in/on grasses must be submitted. A representative aqueous formulation must be applied at the maximum label rate, the maximum number of applications, and the minimum PHI. The test parameters are listed in Table 1. The use of aerial and ground equipment must be represented in separate tests. The states in which tests must be conducted are also listed in Table 1.

A processing study must be conducted for grasses. Grasses bearing detectable residues of the parent and the regulated metabolites should be processed into seeds and seed screening to determine the residue concentration or reduction factor(s). If the grass is treated at exaggerated rates equivalent to at least the maximum theoretical concentration factor due to processing and no detectable residues are found on the RAC, then processing studies are not required.

Guideline #: 171-4(k/l) Description: Crop field trials/process
Commodity: Non-bearing Orchard Crops
Is requirement applicable? (Y/N): N - see discussion
Does the summary/available information indicate that the MRID is a candidate for Phase 5 review?: N/A
Discussion: Registrant has not addressed this use site. Residue data are not needed if product labels are modified as described below.
Data Gap: Product labels with non-bearing orchard crops as use sites must be modified to include the following statement: "Treated crop may not be harvested within one year of application."

ADDITIONAL COMMENTS:
The registrant is advised to consult the Subdivision O Residue Chemistry Guidelines, the Standard Evaluation Procedures, the Data Reporting Guidelines, and the Phase 3 Technical Guidance concerning conduct of residue chemistry studies. If the registrant has additional concerns they are advised to submit a protocol for CBRS review.

Table 1. Test Parameters for Crop Field Trials

Crop	States[1]	Appl. Rate lb a.i./A	Timing	Equip. A, G, C[2]	Max. No. of Appl.	Retreatment Interval, days	PHI, days
Cotton	TX, CA, AZ, MS, LA	2.0	1)pre-plant or post-plant to cracking; broadcast application	G,A	3	7-21	NS[3]
		1.0	2)post-e 3-6" or 1st squares; broadcast application	G,A			
		2.0	3)post-e 3" to 1st bloom, directed application	G			
Orange	FL, CA	4.0	NS	G	3	NS	NS[4]
Lemon	CA, AZ						
Grapefruit	CA, FL, TX						
Bluegrass	ID, OR, WA	6.0	Post weed emerg. before boot stage	G,A	1	N/A	NS
Fescue	MO[5], OR/WA						
Ryegrass	OR, WA						

[1]If a slash appears between states then either site may be chosen.

[2]A = aerial, G = ground, C = chemigation.

[3]NS = Not specified on product labels.

[4]PHI has not been specified on label. Labels should be amended to reflect PHIs from crop field trials.

[5]Data are required from all major growing areas unless a tolerance with regional registration is sought.

PRODUCT CHEMISTRY

Case Name: Methanearsonic acid and salts
Chemical Name(s): Monosodium methanearsonate (MSMA)
Registrant: APC Holdings (Formerly Inter-Ag)

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	N[b]	Y[b]	U[b]
61-2(a)	Y	Y	N	41702001
61-2(b)	Y	N[c]	Y[c]	U[c]
62-1	Y	Y[d]	N	41702002
62-2	Y	N[e]	Y[e]	U[e]
62-3	Y	N[f]	Y[f]	U[f]
63-2	Y	N[g]	Y[g]	U[g]
63-3	Y	N[g]	Y[g]	U[g]
63-4	Y	N[g]	Y[g]	U[g]
63-5	Y	N[g]	Y[g]	U[g]
63-6	Y	N[g]	Y[g]	U[g]
63-7	Y	N[g]	Y[g]	U[g]
63-8	Y	N[g]	Y[g,h]	U[g]
63-9	Y	N[g]	Y[g]	U[g]
63-10	Y	N[g]	Y[g]	U[g]
63-11	Y	N[f]	Y[f]	U[f]
63-12	Y	N[g]	Y[g]	U[g]
63-13	Y	N[g]	Y[g]	U[g]

Key: Y=yes; N=no; I=a decision cannot be made at this time; S=fully satisfies requirement; P=partially; N/A=not applicable; U=unsatisfactory.

Note to CRM: Decisions on Physical/Chemical Characteristics (63 Series) are based on data submitted by CCI on behalf of Task Force 3. Based on correspondence submitted with the Phase 3 package (letter from Les Shockey, APC Holdings, to U.S. EPA, 6/20/90) CBRS cannot determine if Vineland Chemical Company and APC Holdings are members in good standing of the Task Force. Since APC Holdings submitted a study for the 63 Series Physical/Chemical Characteristics, CBRS used that data for the basis of their review, instead of the Task Force data (which was used for the Vineland Chemical review).

[a]MRID No. is not listed if study or summary are found to be inadequate.

[b]A description of the active ingredient was not included.

[c]There is a considerable discrepancy between the theoretical amount of an impurity and the actual amount of that impurity listed on the CSF.

[d]Acceptance of this study is contingent upon submission of information required for 61-1, 61-2(a), 61-2(b), 62-2, and 62-3.

[e]The nominal concentration (Percent by Weight) of the active ingredient listed on the CSF should be between the upper and lower limits, not equivalent to one of them.

[f]The descriptions of the analytical methods needs to be more complete, including a discussion on the theory of the analytical method.

[g]The registrant has not cited the test method and/or test material used. Accordingly CBRS cannot determine the adequacy of the study. The registrant is advised that the MSMA salt must be tested, not a solution.

[h]The registrant has described only the solubility characteristics of water. The solubility of the MSMA salt must be tested, not an aqueous solution.

[i]The registrant has stated that the polarity of the active ingredient precludes the need for this study. However in support of their discussion they cited the dissociation constant data. Acceptance of this arguement is contingent upon submission of adequate dissociation constant data.