



CONFIDENTIAL

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

received

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MAR 25 1988

MEMORANDUM

SUBJECT: Methyl Parathion MP - EPA Registration No. 4787-4  
Cheminova-Response to the Product Chemistry  
Chapter - MRID No. 404824-01, Dated January 20,  
1987 - RCB No. 3280.

FROM: Gobind P. Makhijani, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *-Gom Makhijani*

TO: Dennis H. Edwards, Jr., PM 12  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

and

Amy S. Rispin, Ph.D., Chief  
Science Integration Staff  
Hazard Evaluation Division (TS-769C)

THRU: William J. Boodee, Section Head  
Reregistration Section  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *WJ*

In response to the Methyl Parathion Registration Guidance Document (issued December 15, 1986), A/S Cheminova of Lemvig, Denmark has submitted additional product chemistry data (dated January 11, 1988, MRID No. 404824-01) for their methyl parathion manufacturing-use product (MP) (EPA Registration No. 4784-4).

These data and our conclusions are described below.  
Also revised Tables A and B are provided at the end of this report.

62-1 - Preliminary Analysis

The registrant has provided (MRID No. 404824-01) preliminary analyses of five batches of methyl parathion MP produced in 1987. The results of the preliminary analyses of these five batches are discussed in Confidential Appendix A.

No further information is needed for this topic.

62-2 - Certification of Limits

The registrant has submitted the required information (dated December 1, 1987) giving the lower and upper certified limits for the active ingredient, and upper limits for the impurities in their MP. These limits are discussed in Confidential Appendix A. However this information must be submitted on EPA Form 8570-4 (Rev. 02-85).

On receipt of the correctly completed form, this data gap will be considered fulfilled.

62-3 - Analytical Methods to Verify Certified Limits

The registrant has submitted analytical methods for the determination of active ingredients and other impurities in the MP (MRID No. 404824-01). However, no representative chromatograms have been submitted for any of these methods. Upon receipt of the representative chromatograms, this data gap will be considered fulfilled.

All the analytical methods have been validated by the registrant for precision and accuracy and no further information is required on this subtopic.

Attachment I: Tables A and B (4 pages)

cc: Methyl Parathion Registration Standard, S.F., Reviewer  
RBP, PMSD/ISB (E. Eldredge), D. Edwards (PM 12) TOX  
(Coberly)

Attachment II: Confidential Appendices A & B (4 pages)

cc: Methyl Parathion Registration Standard, S.F., Reviewer  
RBP, PMSD/ISB (E. Eldredge), D. Edwards (PM 12), TOX  
(Coberly)

cc: Methyl Parathion Registration Standard, S.F., R.F.,  
Reviewer, PMSD/ISB (E. Eldredge), D. Edwards (PM 12)  
Circu, RBP, TOX (Coberly).



| Guideline Citation and<br>Name of Test                | Test<br>Substance <sup>1</sup> / | Guidelines<br>Status | Are Data<br>Required?               |                                        | Reference          |
|-------------------------------------------------------|----------------------------------|----------------------|-------------------------------------|----------------------------------------|--------------------|
|                                                       |                                  |                      | [Yes]                               | [No]                                   |                    |
| <u>\$158.120 Product Chemistry (cont'd)</u>           |                                  |                      |                                     |                                        |                    |
| <u>Physical and Chemical Characteristics (cont'd)</u> |                                  |                      |                                     |                                        |                    |
| 63-7 - Density, Bulk Density, or<br>Specific Gravity  | TGAI                             | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 404066-01 |
| 63-8 - Solubility                                     | TGAI or PAI                      | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 404066-01 |
| 63-9 - Vapor Pressure                                 | PAI                              | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 00055860  |
| 63-10 - Preliminary Analysis                          | PAI                              | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 404066-01 |
| 63-11 - Octanol/Water Partition<br>Coefficient        | PAI                              | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 00055860  |
| 63-12 - pH                                            | TGAI                             | R                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 404066-01 |
| 63-13 - Stability                                     | TGAI                             | R                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| <u>Other Requirements:</u>                            |                                  |                      |                                     |                                        |                    |
| 64-1 - Submittal of samples                           | TGAI, PAI                        | CR                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> 2/ |                    |

1/            TGAI = Technical Grade of the Active Ingredient; PAI - Pure Active Ingredient; R = Required;  
CR = Conditionally Required.

2/ If samples are needed, the Agency will request them.

TABLE B  
PRODUCT-SPECIFIC DATA REQUIREMENTS FOR MANUFACTURING-USE PRODUCTS CONTAINING METHYL PARATHION (Cheminova)  
EPA Registration No. 4784-4

| Guideline Citation and<br>Name of Test                                    | Test<br>Substance | Guidelines<br>Status | Are Data<br>Required?                             |                                     | Reference                                  |
|---------------------------------------------------------------------------|-------------------|----------------------|---------------------------------------------------|-------------------------------------|--------------------------------------------|
|                                                                           |                   |                      | [Yes]                                             | [No]                                |                                            |
| <u>\$158.120 Product Chemistry</u>                                        |                   |                      |                                                   |                                     |                                            |
| <u>Product Identity:</u>                                                  |                   |                      |                                                   |                                     |                                            |
| 61-1 - Product Identity and Disclosure<br>of Ingredients                  | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 404824-01                         |
| 61-2 - Description of Beginning<br>Materials and Manufacturing<br>Process | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID Nos. 00055866,<br>00055859, 404066-01 |
| 61-3 - Discussion of Formation of<br>Impurities                           | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 00055859                          |
| <u>Analysis and Certification of Product<br/>Ingredients</u>              |                   |                      |                                                   |                                     |                                            |
| 62-1 - Preliminary Analysis                                               | MP                | CR                   | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 404824-01                         |
| 62-2 - Certification of Limits                                            | MP                | R                    | <input checked="" type="checkbox"/> <sup>1/</sup> | <input type="checkbox"/>            | MRID No. 404824-01                         |
| 62-3 - Analytical Methods to Verify<br>Certified Limit                    | MP                | R                    | <input checked="" type="checkbox"/> <sup>2/</sup> | <input type="checkbox"/>            | MRID No. 404824-01                         |
| <u>Physical and Chemical Characteristics</u>                              |                   |                      |                                                   |                                     |                                            |
| 63-2 - Color                                                              | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 404066-01                         |
| 63-2 - Physical State                                                     | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 404066-01                         |
| 63-4 - Odor                                                               | MP                | R                    | <input type="checkbox"/>                          | <input checked="" type="checkbox"/> | MRID No. 404066-01                         |

1/ Certification of Limits should be submitted on Form 8570 (Rev. 2-85).  
2/ Representative chromatograms for the various methods should be submitted.

TABLE B  
PRODUCT SPECIFIC DATA REQUIREMENTS FOR MANUFACTURING-USE PRODUCTS CONTAINING METHYL PARATHION (Cheminova)  
EPA Registration No. 4784-4

| Guideline Citation and<br>Name of Test                | Test<br>Substance <sup>1/</sup> | Guidelines<br>Status <sup>2/</sup> | Are Data<br>Required?               |                                        | Reference          |
|-------------------------------------------------------|---------------------------------|------------------------------------|-------------------------------------|----------------------------------------|--------------------|
|                                                       |                                 |                                    | [Yes]                               | [No]                                   |                    |
| <u>\$158.120 Product Chemistry (cont'd)</u>           |                                 |                                    |                                     |                                        |                    |
| <u>Physical and Chemical Characteristics (cont'd)</u> |                                 |                                    |                                     |                                        |                    |
| 63-7 - Density, Bulk Density, or<br>Specific Gravity  | MP                              | R                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/>    | MRID No. 404824-01 |
| 63-12 - pH                                            | MP                              | CR                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-14 - Oxidizing or Reducing Action                  | MP                              | CR                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-15 - Flammability                                  | MP                              | CR                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-16 - Explodability                                 | MP                              | R                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-17 - Storage Stability                             | MP                              | R                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-18 - Viscosity                                     | MP                              | R                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-19 - Miscibility                                   | MP                              | CR                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| 63-20 - Corrosion Characteristics                     | MP                              | R                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>               |                    |
| <u>Other Requirements:</u>                            |                                 |                                    |                                     |                                        |                    |
| 64-1 - Submittal of samples                           | MP                              | CR                                 | <input type="checkbox"/>            | <input checked="" type="checkbox"/> 3/ |                    |

1/ MP = Manufacturing-Use Product.  
2/ R = Required; CR = Conditionally Required.  
3/ If samples are needed, the Agency will request them.

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Page \_\_\_\_\_ is not included in this copy.

Pages 7 through 10 are not included in this copy.

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The material not included contains the following type of information:

Identity of product inert ingredients.

\_\_\_\_\_ Identity of product inert impurities.

☒ Description of the product manufacturing process.

\_\_\_\_\_ Description of quality control procedures.

\_\_\_\_\_ Identity of the source of product ingredients.

\_\_\_\_\_ Sales or other commercial/financial information.

\_\_\_\_\_ A draft product label.

\_\_\_\_\_ The product confidential statement of formula.

\_\_\_\_\_ Information about a pending registration action.

\_\_\_\_\_ FIFRA registration data.

\_\_\_\_\_ The document is a duplicate of page(s)

\_\_\_\_\_ The document is not responsive to the request.

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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

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