



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

CONFIDENTIAL

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JUL 23 1990

MEMORANDUM

SUBJECT: Addendum to Trichlorfon Product Chemistry
Registration Standard Update.

FROM: Richard D. Schmitt, Ph.D., Chief
Dietary Exposure Branch (DEB)
Health Effects Division (H7509C) *Richard D. Schmitt*

TO: Lois Rossi, Chief
Reregistration Branch
Special Review & Reregistration Division (H7508C)

and

Reto Engler, Ph.D., Chief
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

Attached is an addendum to the update of the Product Chemistry Chapter of the Trichlorfon Registration Standard. This document has been prepared by Dynamac Corporation under supervision of the Dietary Exposure Branch, HED and has been revised to reflect Agency policies.

Issues addressed in this addendum pertain only to data requirements for the Mobay Corp. 80% FI (EPA Reg. No. 3125-371), the Mobay Corp. 18% FI (EPA Reg. No. 3125-343), and the Kaw Valley, Inc. 80% FI (EPA Reg. No. 44215-128), and to the adequacy of data submitted for the Mobay Agricultural 98% T (EPA Reg. No. 3125-9) to fulfill requirements for the Mobay Animal Health 98% T (EPA Reg. No. 11556-30). The data requirements for all other trichlorfon MPs remain as stated in the Registration standard Update dated 5/15/90.

Please note that Confidential Business Information is attached as Appendices A, B, and C.

If you need additional input please advise.

Attachment 1: Addendum to Trichlorfon Product Chemistry Reg.
Standard Update of 05/15/90.

Attachment 2: Confidential Appendices A, B, and C.

cc (with attachments 1 & 2): W. Smith, Trichlorfon Reg. Std.
file, Trichlorfon Subject File, C. Furlow (PIB/FOD), J. Burrell
(FOD), Dynamac.

cc (without attachments): RF, Circ.(8)

Final Report

**TRICHLORFON (Addendum)
Task 4: Product Chemistry.
Registration Standard Update**

Contract No. 68-D8-0080

July 13, 1990

Submitted to:
Environmental Protection Agency
Arlington, VA 22202

Submitted by:
Dynamac Corporation
The Dynamac Building
11140 Rockville Pike
Rockville, MD 20852

TRICHLORFON

REGISTRATION STANDARD UPDATE

PRODUCT CHEMISTRY - ADDENDUM

Task - 4

INTRODUCTION

The Trichlorfon Registration Standard Update dated 5/15/90 did not address data requirements for the following three manufacturing-use products (MPs) registered subsequent to the Guidance Document dated 6/84: (i) the Mobay Corp. 80% formulation intermediate (FI; EPA Reg. No. 3125-371); (ii) the Mobay Corp. 18% FI (EPA Reg. No. 3125-343); and (iii) the Kaw Valley, Inc. 80% FI (EPA Reg. No. 44215-128). In addition, A letter to the registrant dated 5/16/86 (W. Miller, Registration Division, EPA) cites the intention of Bayvet (now Mobay Animal Products) to rely on data submitted on the Mobay Agricultural 98% T (EPA Reg. No. 3125-9) to satisfy requirements for data on their 98% T (EPA Reg. No. 11556-30), and data on the 80% FI (EPA Reg. No. 3125-66) to satisfy requirements for their 82% FI (EPA Reg. No. 11556-55). We note, however, that the 80% FI registered under EPA Reg. No. 3125-66 has been cancelled; therefore, all product chemistry data requirements remain outstanding for the 82% FI (EPA Reg. No. 11556-55).

No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128) and, therefore, all product chemistry data requirements remain outstanding for this product.

Issues addressed in this addendum pertain only to data requirements for the Mobay Corp. 80% formulation intermediate (EPA Reg. No. 3125-371), the Mobay Corp. 18% FI (EPA Reg. No. 3125-343), and the Kaw Valley, Inc. 80% FI (EPA Reg. No. 44215-128), and to the adequacy of data submitted for the Mobay Agricultural 98% T (EPA Reg. No. 3125-9) to fulfill requirements for the Mobay Animal Health 98% T (EPA Reg. No. 11556-30). The data requirements for all other trichlorfon MPs remain as stated in the Registration Standard Update dated 5/15/90.

61-1. Product Identity and Disclosure of Ingredients

Mobay Agricultural Products (MRID 00152133) submitted information pertaining to product composition and a Confidential Statement of Formula (CSF) for the 98% T (EPA Reg. No. 3125-9); these data are presented in Confidential Appendix A to the Registration Standard Update. The data do not satisfy the requirements of 40 CFR §158.155 for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because nominal concentrations were not reported for impurities present at >0.1% by weight of the TGAI or impurities of

toxicological concern. In addition, a CSF for EPA Reg. No. 11556-30 is not available and must be submitted.

Mobay submitted data (MRID 00158290) for the 80% FI (EPA Reg. No. 3125-371). These data are presented in Confidential Appendix A of this document and do not satisfy the requirements of 40 CFR §158.155 (Guideline Reference No. 61-1) regarding product composition for the Mobay 80% FI (EPA Reg. No. 3125-371) because nominal concentrations were not provided for the active and inert ingredients, and the purpose of each inert was not included. Additional data are required.

Mobay submitted data (MRID 00145104) and a CSF for the 18% FI (EPA Reg. No. 3125-343); this information is presented in Confidential Appendix A of this document. The data do not satisfy requirements of 40 CFR §158.155 because nominal concentrations of two ingredients do not fall within the certified limits. Additional data are required.

No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this topic.

61-2. Description of Starting Materials and Manufacturing Process

Mobay Agricultural Products (MRID 00152133) submitted information pertaining to the starting materials and manufacturing process for the 98% T (EPA Reg. No. 3125-9); these data are presented in Confidential Appendix B to the Registration Standard Update. As stated in the Update, these data do not satisfy the requirements of 40 CFR §158.160 for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because the submission failed to report (i) the relative amounts and producer/supplier of the beginning materials; (ii) a description of the equipment used and conditions controlled during the process; (iii) the duration of each step in the process; and (iv) a description of quality control procedures. Additional data are required.

Mobay submitted a brief discussion (MRID 00145104) of the formulation process of the 18% FI (EPA Reg. No. 3125-343); this information is presented in Confidential Appendix B to this document. The data do not satisfy requirements of 40 CFR §158.160 because the following information was not included: (i) technical specifications for each ingredient; (ii) a description of the conditions (i.e., temperature, pressure, pH, humidity) controlled during each step of the process; (iii) a description of the equipment used; (iv) the duration of each step in the process; and (v) a description of any purification or recycling procedures used to assure consistent composition of the product (quality control). Additional data are required.

Mobay and Kaw Valley have not submitted data pertaining to the starting materials and formulation process of their 80% FIs (EPA Reg. Nos. 3125-371 and 44215-128, respectively); data requirements remain outstanding for these products.

61-3. Discussion of the Formation of Impurities

Mobay submitted a brief discussion (MRID 00145104) of the formation of impurities in the 18% FI (EPA Reg. No. 3125-343); this information is presented in Confidential Appendix C to this document. The data do not satisfy requirements of 40 CFR §158.167 because no information was submitted concerning the carryover of impurities of toxicological significance from the trichlorfon technical source product. Additional information is required.

Mobay has not submitted a discussion of the formation of impurities for the 80% FI or the 98% Ts (EPA Reg. Nos. 3125-371, and 3125-9 and 11556-30, respectively) and no data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for these products.

62-1. Preliminary Analysis

Mobay Agricultural Products (MRID 00148973) submitted data from preliminary analysis of the 98% T (EPA Reg. No. 3125-9); these data are presented in Confidential Appendix D to the Registration Standard Update. As stated in the Update, these data do not satisfy the requirements of 40 CFR §158.170 for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because validation data were not submitted for the analytical methods. Once validated, these data may also be applied to the Mobay 80% and 18% FIs (EPA Reg. Nos. 3125-371 and 3125-343, respectively) for preliminary analysis. Additional data are required.

No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this product.

62-2. Certified Limits

Mobay Agricultural Products (MRID 00152133) submitted certified limits for the 98% T (EPA Reg. No. 3125-9); these data are presented in Confidential Appendix A to the Registration Standard Update. The data do not satisfy the requirements of 40 CFR §158.175 for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because the registrant did not explain how the certified limits

were determined. A revised CSF must be submitted on EPA Form 8570-4 for each product.

Mobay submitted data (MRID 00158290) for the 80% FI (EPA Reg. No. 3125-371); this information is presented in Confidential Appendix A to this document. These data satisfy requirements of 40 CFR §158.175 (Guideline Reference No. 62-2) regarding certified limits of the 80% FI (EPA Reg. No. 3125-371).

Mobay submitted data (MRID 00145104) and a CSF for the 18% FI (EPA Reg. No. 3125-343); this information is presented in Confidential Appendix A to this document. The data do not satisfy requirements of 40 CFR §158.175 because nominal concentrations of two ingredients do not fall within the certified limits. Additional data are required.

No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this topic.

62-3. Enforcement Analytical Methods

Mobay Agricultural Products (MRID 00148973) submitted information pertaining to enforcement analytical methods for the 98% T (EPA Reg. No. 3125-9); these data are presented in the Registration Standard Update and in Confidential Appendix E to that document. As stated in the Update, these data do not satisfy the requirements of 40 CFR §158.180 for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because validation data were not reported. Once validated, these methods may be applied to the 80% and 18% FIs (EPA Reg. Nos. 3125-371 and 3125-343, respectively) for enforcement analytical methods. Additional data are required.

No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this topic.

PHYSICAL AND CHEMICAL CHARACTERISTICS

Mobay Agricultural Products (MRID 00152133) submitted information pertaining to the physical and chemical characteristics of the 98% T (EPA Reg. No. 3125-9); these data are presented in the Registration Standard Update in Table 1. As stated in the Update, additional information is required for the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) regarding stability and the methods used to determine density and corrosion characteristics.

In addition, Mobay submitted data (MRID 00145104) regarding physical and chemical characteristics of the 18% FI (EPA Reg. No. 3125-343); this information is presented below in Table 1. These

data satisfy the requirements of 40 CFR §158.190. No additional data are required.

Mobay and Kaw Valley have not submitted data pertaining to the physicochemical characteristics of their 80% FIs (EPA Reg. Nos. 3125-371 and 44215-128, respectively); data requirements remain outstanding for these products.

Table 1. Physical and chemical properties of the Mobay 18% FI (MP), EPA Reg. No. 3125-343; data are from MRID 00145104.

No., 40 CFR §158.190; Name of Property	Description [Method]
63-2. Color	clear, aqua-green [Mobay TM A-20.1]
63-3. Physical state	non-viscous liquid [Mobay TM A-20.1]
63-4. Odor	mixture of xylene and glycol ether odor [in accordance with 40 CFR §158.120]
63-5. Melting point	liquid at room temperature.
63-7. Specific gravity	1.01 at 20 C/20 C [OECD Guideline No. 109]
63-12. pH	3.6 (1% aqueous solution) [ASTM E 70-77]
63-14. Oxidizing or reducing action	not an oxidizing or reducing agent
63-15. Flammability	flash point = 82 F [ANSI/ASTM D 3278-78]
63-16. Explodability	No impact explosive characteristics
63-17. Storage stability	exhibited 0.3-0.4% loss of activity following 16 weeks of storage in glass containers at 0-40 C
63-18. Viscosity	4 centipoises at 20 C [OECD No. 114]
63-19. Miscibility	not required
63-20. Corrosiveness	not compatible with plain steel and tin plate, aluminum, vinyl pigment phenolic coating, brass, copper, and clear phenolic coating; compatible with stainless steel, teflon, nylon, heresite P403 coating, Lithcote LC-24 coating, and C-20 pigmented phenolic coatings [Mobay methods 1022 and 1026]

TABLE A. GENERIC DATA REQUIREMENTS FOR THE TRICHLORFON TECHNICAL GRADE OF THE ACTIVE INGREDIENT.¹

Data Requirement	Test Substance ²	Does EPA have data to satisfy this requirement?	Bibliographic Citation ³	Must additional data be submitted under FIFRA Sec. 3(c)(2)(B)?
<u>40 CFR §158.155-190 Product Chemistry</u>				
<u>Product Composition</u>				
61-2. Beginning Materials and Production Process	TGAI	Partially	00152133	Yes ⁴
61-3. Formation of Impurities	TGAI	No	N/A	Yes ⁵
<u>Analysis and Certification of Product Ingredients</u>				
62-1. Preliminary Analysis	TGAI	Partially	00148973	Yes ⁶
<u>Physical and Chemical Characteristics⁷</u>				
63-2. Color	TGAI	Partially	00152133	Yes ⁸
63-3. Physical State	TGAI	Partially	00152133	Yes ⁸
63-4. Odor	TGAI	Partially	00152133	Yes ⁸
63-5. Melting Point	TGAI	Partially	00152133	Yes ⁹
63-6. Boiling Point	TGAI	Partially	N/A	Yes ¹⁰
63-7. Density, Bulk Density, or Specific Gravity	TGAI	Partially	00152133	Yes ¹¹
63-8. Solubility	TGAI or PAI	Partially	00152133	Yes ⁸
63-9. Vapor Pressure	TGAI or PAI	Partially	00152133	Yes ⁸
63-10. Dissociation Constant	TGAI or PAI	Partially	00152133	Yes ⁸
63-11. Octanol/Water Partitioning Coefficient	PAI	Partially	00152133	Yes ¹²
63-12. pH	TGAI	Partially	00152133	Yes ⁸
63-13. Stability	TGAI	Partially	00152133	Yes ¹³
<u>Other Requirements:</u>				
64-1. Submittal of Samples	N/A	N/A	N/A	No

1. The following requirements pertain to the Mobay Agricultural Division 98% T (EPA Reg. No. 11556-30), Mobay Corp. 80% and 18% FIs (EPA Reg. Nos. 3125-371 and 3125-343, respectively), and Kaw Valley Inc. 80% FI

TABLE A. (Continued).

(EPA Reg. No. 44215-128). Additional data requirements are listed in the following Table B, "Product Specific Data Requirements for Trichlorfon Manufacturing-Use Products".

2. Test substance: PAI = purified active ingredient; TCAL = technical grade of the active ingredient; MP = manufacturing-use product.

3. Underlining indicates documents that have been reviewed in this Update Addendum.

4. For the Mobay 98% T (EPA Reg. No. 11556-30) (i) the relative amounts and producer/supplier of the beginning materials; (ii) a description of the equipment used and conditions controlled during the process; (iii) the duration of each step in the process; and (iv) a description of quality control procedures are required. For the 18% FI (EPA Reg. No. 3125-343), following information is required: (i) technical specifications for each ingredient; (ii) a description of the conditions (i.e., temperature, pressure, pH, humidity) controlled during each step of the process; (iii) a description of the equipment used; (iv) the duration of each step in the process; and (v) a description of any purification or recycling procedures used to assure consistent composition of the product (quality control). For the Mobay and Kaw Valley 80% FIs (EPA Reg. Nos. 3125-371 and 44215-128), all data pertaining to the starting materials and manufacturing process are required.

5. For the 18% FI (EPA Reg. No. 3125-343), data are required concerning the carryover of impurities of toxicological significance from the trichlorfon technical source product. For the Mobay 80% FI and 98% T (EPA Reg. Nos. 3125-371 and 11556-30, respectively) and for the Kaw Valley 80% FI (EPA Reg. No. 44215-128), all data requirements regarding the formation of impurities must be submitted.

6. No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this product.

7. As required by 40 CFR §158.190 and more fully described in the Pesticide Assessment Guidelines, Subdivision D, Guidelines Reference Nos. 63-2 through 63-13, data must be submitted on physicochemical characteristics (color, physical state, odor, melting point, boiling point, specific gravity, solubility, vapor pressure, dissociation constant, octanol/water partition coefficient, pH, and stability). There are additional data requirements listed in Table B pertaining to physicochemical characteristics of those technical products which are also manufacturing use products.

TABLE A. (Continued).

8. Kaw Valley has not responded for its 80% FI; data are required for this topic.
9. Kaw Valley has not responded to data requirements for its 80% FI; data on melting point are required if the technical chemical is a solid at room temperature.
10. Kaw Valley has not responded to data requirements for its 80% FI; data on boiling point are required if the technical product is a liquid at room temperature.
11. Kaw Valley has not responded to data requirements for its 80% FI; data are required on this topic. Mobay has responded for its 98% T; however the method used must be submitted.
12. Kaw Valley has not responded to data requirements for its 80% FI; data are required if the technical chemical is organic and nonpolar.
13. Kaw Valley has not responded to data requirements for its 80% FI; data are required for this topic. Mobay has responded for its 98% T; however the stability of the product to metal ions and sunlight are required.

TABLE B. PRODUCT SPECIFIC DATA REQUIREMENTS FOR TRICHLORFON MANUFACTURING-USE PRODUCTS.¹

Data Requirement	Test Substance ²	Does EPA have data to satisfy this requirement?	Bibliographic Citation ³	Must additional data be submitted under FIFRA Sec. 3(c)(2)(B)?
<u>40 CFR §158.155-190 Product Chemistry</u>				
<u>Product Composition</u>				
61-1. Product Composition	MP	Partially	00152133 00158290 00145104	Yes ⁴
61-2. Beginning Materials & Production/Formulation Process	MP	Partially	00152133 00145104	Yes ⁵
61-3. Formation of Impurities	MP	Partially	00145104	Yes ⁶
<u>Analysis and Certification of Product Ingredients</u>				
62-1. Preliminary Analysis	MP	Partially	00148973	Yes ⁷
62-2. Certified Limits	MP	Partially	00152133 00158290 00145104	Yes ⁸
62-3. Enforcement Analytical Methods	MP	Partially	00148973	Yes ⁹
<u>Physical and Chemical Characteristics¹⁰</u>				
63-2. Color	MP	Partially	00152133 00145104	Yes ¹¹
63-3. Physical State	MP	Partially	00152133 00145104	Yes ¹¹
63-4. Odor	MP	Partially	00152133 00145104	Yes ¹¹
63-7. Density, Bulk Density, or Specific Gravity	MP	Partially	00152133 00145104	Yes ¹²
63-12. pH	MP	Partially	00152133 00145104	Yes ¹³
62-14. Oxidizing or Reducing Action	MP	Partially	00152133 00145104	Yes ¹⁴
62-15. Flammability	MP	Partially	00152133 00145104	Yes ¹⁵
63-16. Explosibility	MP	Partially	00152133 00145104	Yes ¹⁶
63-17. Storage Stability	MP	Partially	00152133 00145104	Yes ¹¹
63-18. Viscosity	MP	Partially	00152133 00145104	Yes ¹⁷
63-19. Miscibility	MP	Partially	00152133 00145104	Yes ¹⁸
63-20. Corrosion Characteristics	MP	Partially	00152133 00145104	Yes ¹²

(Continued, footnotes follow)

TABLE B. (Continued).

Data Requirement	Test Substance	Does EPA have data to satisfy this requirement?	Bibliographic Citation	Must additional data be submitted under FIFRA Sec. 3(c)(2)(B)?
<u>Other Requirements:</u>				
64-1. Submittal of Samples	N/A	N/A	N/A	No

1. The following requirements pertain to the Mobay Agricultural Division 98% T (EPA Reg. No. 11556-30), Mobay Corp. 80% and 18% FIs (EPA Reg. Nos. 3125-371 and 3125-343, respectively), and Kaw Valley Inc. 80% FI (EPA Reg. No. 44215-128). Additional data requirements are listed in the preceding Table A, "Generic Data Requirements for the Trichlorfon Technical Grade of the Active Ingredient".

2. Test substance: PAI = purified active ingredient; TGAI = technical grade of the active ingredient; MP = manufacturing-use product.

3. Underlining indicates documents that have been reviewed in this Update Addendum.

4. For the Mobay Agricultural 98% T (EPA Reg. No. 3125-9) and the Mobay Animal Health 98% T (EPA Reg. No. 11556-30), nominal concentrations must be reported for impurities present at >0.1% by weight of the TGAI and impurities of toxicological concern. In addition, a CSF for EPA Reg. No. 11556-30 is not available and must be submitted. For the Mobay 80% FI (EPA Reg. No. 3125-371), nominal concentrations must be provided for each active and inert ingredient and the purpose of each inert must be reported. For the Mobay 18% FI (EPA Reg. No. 3125-343) a revised statement of formula stating the appropriate nominal concentrations for all ingredients is required. For the Kaw Valley 80% FI (EPA Reg. No. 44215-128) all data regarding product identity and ingredients are required. Revised CSFs are required for all of the above-named products, and must be submitted on EPA Form 8570-4 (Rev. 2/85).

5. For the Mobay 98% T (EPA Reg. No. 11556-30) (i) the relative amounts and producer/supplier of the beginning materials; (ii) a description of the equipment used and conditions controlled during the process; (iii) the duration of each step in the process; and (iv) a description of quality control procedures are required. For the 18% FI (EPA Reg. No. 3125-343), following information is required: (i) technical

TABLE B. (Continued).

specifications for each ingredient; (ii) a description of the conditions (i.e., temperature, pressure, pH, humidity) controlled during each step of the process; (iii) a description of the equipment used; (iv) the duration of each step in the process; and (v) a description of any purification or recycling procedures used to assure consistent composition of the product (quality control). For the Mobay and Kaw Valley 80% FIs (EPA Reg. Nos. 3125-371 and 44215-128), all data pertaining to the starting materials and manufacturing process are required.

6. For the 18% FI (EPA Reg. No. 3125-343), data are required concerning the carryover of impurities of toxicological significance from the trichlorfon technical source product. For the Mobay 80% FI and 98% T (EPA Reg. Nos. 3125-371 and 11556-30, respectively) and for the Kaw Valley 80% FI (EPA Reg. No. 44215-128), all data requirements regarding the formation of impurities must be submitted.

7. No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this product.

8. For the 98% T (EPA Reg. No. 11556-30), the registrant must explain how the certified limits reported for their other 98% T (EPA Reg. No. 3125-9) were determined. A revised CSF must be submitted on EPA Form 8570-4 for each product. For the Mobay 18% FI (EPA Reg. No. 3125-343), appropriate certified limits based on the nominal concentrations of ingredients data are required. No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this topic.

9. For the 98% Ts (EPA Reg. Nos. 3125-9 and 11556-30) because validation data must be reported. Once validated, these methods may be applied to the 80% and 18% FIs (EPA Reg. Nos. 3125-371 and 3125-343, respectively) for enforcement analytical methods. No data have been submitted for the Kaw Valley 80% FI (EPA Reg. No. 44215-128); data requirements remain outstanding for this topic.

10. As required in 40 CFR §158.190 and more fully described in the Pesticide Assessment Guidelines, Subdivision D, Guidelines Reference Nos. 63-2 through 63-20, data must be submitted on physicochemical characteristics of each manufacturing-use product (color, physical state, odor, specific gravity, pH, oxidizing or reducing action, flammability, explosibility, storage stability, viscosity, miscibility, and corrosion characteristics). Additional data requirements regarding physicochemical properties of manufacturing-use products which contain only the technical grade of the active ingredient are listed in Table A, "Generic Data Requirements for the Trichlorfon Technical Grade of the Active Ingredient."

TABLE B. (Continued).

11. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data are required on this topic.
12. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data are required on this topic. Mobay has responded for their 98% Ts; however the methods used must be submitted.
13. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data on pH are required if the test substance is dispersible in water.
14. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data are required on oxidizing/reducing potential if the product contains an oxidizing or reducing agent.
15. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data are required on flammability if the product contains combustible liquids.
16. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data are required if the product is potentially explosive.
17. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data on viscosity are required if the product is a liquid.
18. Mobay and Kaw Valley have not responded to data requirements for their 80% FIs; data on miscibility are required if the product is an emulsifiable liquid and is to be diluted with petroleum solvents.

TRICHLORFON
REGISTRATION STANDARD UPDATE
PRODUCT CHEMISTRY - ADDENDUM
TASK 4

CONFIDENTIAL APPENDICES

Appendix A: 3 Page(s)
Appendix B: 1 Page(s)
Appendix C: 1 Page(s)

Confidential Appendices to the Scientific Review Addendum for the
pesticide trichlorfon by the Dietary Exposure Branch
[Confidential FIFRA Trade Secret/CBI].

TRICHLORFON PRODUCT CHEMISTRY

Page _____ is not included in this copy.

Pages 18 through 22 are not included in this copy.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients
 - ☐ Identity of product impurities
 - ☒ Description of the product manufacturing process
 - ☒ Description of product 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
-

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.
