



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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA File No. 46620-R. Chemical identity of Requat
Antimicrobial 1977 Liquid.

FROM: Richard Loranger, Chemist *R. Loranger*
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TO: John Lee, Product Manager #31
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THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
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We have been requested to determine whether the active ingredient of Requat Antimicrobial 1977 Liquid is identical or substantially similar to the active ingredient in Dow Corning 5700 Antimicrobial Agent (EPA Reg. No. 34292-1).

The active ingredient of Requat is 3-(trimethoxysilyl)propyl-
didecylmethylammonium chloride prepared by the reaction of
[redacted] In the
synthesis of the Dow Corning product [redacted]

Therefore, the Dow quat [3-(trimethoxysilyl)propyloctadecyl-
dimethylammonium chloride] has two alkyl groups (octadecyl,
methyl) that differ from those (two decyl groups) in Requat.
These active ingredients are thus not chemically identical or
substantially similar for the purposes of a "me-too" registration.

Conclusion

The active ingredient of Requat Antimicrobial 1977 Liquid is
not chemically identical or substantially similar to the
active ingredient of the Dow Corning product for the purposes
of a "me-too" registration.

cc: Circu, R.F. Reviewer, Subject file, Amended use file
TS-769:Reviewer:R.Loranger:LDT:X77324:CM:RM:810:Date:1/29/82
RDI:Section Head:RJH:Date:1/28/82:RDS:Date:1/28/82

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