

JAN 2 1991

SUBJECT; Product Chemistry Review of CGA-163935 Technical (EPA ID No. 100-EUP-OE) *alfred Smith*  
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APPLICANT; CIBA - GEIGY Corporation

EPA ID No: 100-EUP-OE

MRID NOS: 416042-01, -02, -03, -04

CAS No: 95266-40-3

CHEMICAL NAME; 4-(Cyclopropyl-alpha-hydroxymethylene)-3,5-dioxo-cyclohexanecarboxylic acid ethyl ester

PRODUCT NAME; CGA-163935 Technical

USE; Plant Growth Regulator

#### INTRODUCTION

CIBA-GEIGY's submission of July 10, 1990 contains a request for an experimental use permit to conduct limited experimental field trials with a new chemical CGA-163935 as active ingredient (ai) in the technical product (TGAI) and the end use product (EP) Primo/Vision Turf Growth Regulator. Product chemistry data are submitted to support the requirements of 40 CFR 158.150 for the TGAI and the EP.

#### PRODUCT IDENTITY AND COMPOSITION (MRID No. 416042-01)

##### 61-1: Product Identity and Disclosure of Ingredients

For a discussion of the product identity of the ai CGA-163935, see Confidential Appendix A. A Confidential Statement of Formula (CSF, EPA Form 8570-4) which contains the composition of the TGAI is discussed in Confidential Appendix B.

The data satisfy the requirements of 40 CFR 158.155 (Guidelines Reference Number, GRN, 61-1). No additional data are needed.

##### 61-2: Beginning Materials and Manufacturing Process

See Confidential Appendix A for discussion of beginning materials and manufacturing process.

The data satisfy the requirements of 40 CFR 158.160-162 (GRN 61-2). No additional data are needed.

##### 61-3: DISCUSSION OF THE FORMATION OF IMPURITIES

See Confidential Appendix A for a discussion of the formation of impurities.

The data satisfy the requirements of 40 CFR 158.167 (GRN 61-3). No additional data are needed.

#### ANALYSIS AND CERTIFICATION OF PRODUCT INGREDIENTS ( MRID No. 416042-02)

##### 62-1: Preliminary Analysis

Five samples of the technical CGA-163935 were examined for the ai and its impurities. A discussion of the results and the analytical methods used are included in Confidential Appendix B.

The data satisfy the requirements of 40 CFR 158.170 (GRN 62-1). No additional data are needed.

##### 62-2: Certified Limits

The certified limits are contained in the CSF and are discussed in Confidential Appendix B.

The data satisfy the requirements of 40 CFR 158.175 (GRN 62-2). No additional data are needed.

##### 62-3: Enforcement Analytical Methods

Adequate enforcement methods are submitted and discussed in Confidential Appendix B under section 62-1 (Preliminary Analysis). No additional data are needed.

#### PHYSICAL AND CHEMICAL CHARACTERISTICS

The physicochemical properties of CGA-163935 Technical (TGAI) are summarized below (MRID No. 416042-03).

<u>GRN</u>	<u>Property</u>	<u>Description</u>
63-2	Color	Yellow to red-brown
63-3	Physical State	Liquid or Crystals
63-4	Odor	Slightly sweet
63-6	Boiling Point	>270 degrees
63-7	Density	1.215 g/ml at 20 degrees C
63-8	Solubility	g/100 ml): water, 0.28- 2.11 at pH 4.9 -8.2; acetone, 100; ethanol, 100; toluene, 100; n-hexane, 5.0; n-octanol, 100
63-9	Vapor Pressure	1.62x10 <sup>-5</sup> mm Hg at 25 degrees C
63-10	Dissociation Constant	4.57
63-11	Octanol/Water Partition Coefficient	Log P = 2.44; Kow = 275
63-12	pH	3.3 at 20 degrees C ( 1% solution in water)
63-13	Stability	Work in progress

The data satisfy the requirements of 40 CFR 158.190 except GRN 63-13 for which work is in progress.

#### SUMMARY OF DEFICIENCIES

The Applicant reports that work is in progress for the stability data (GRN 63-13). Presumably the study will be forwarded to the Agency when completed.

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## ATTACHMENTS;

Confidential Attachments A and B

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Pages 4 through 13 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 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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