

DATE OUT: 5/JUN/2002

SUBJECT: PRODUCT CHEMISTRY REVIEW OF Manufacturing Use Product [], End-Use Product [x]
BARCODE No. : D283407; D281281 ; CASE No.: 006559 ;EPA RECEIVED DATE: 08/JUN/00; EPA REG No.;
100-1055; PRODUCT NAME: Weather Block Rodenticide Bait with Bitrex ; COMPANY NAME: Syngenta Crop
Protection, Inc.; MRID # : 440634-01, -02, -03; 455758-01; 456724-01 ; Action Code: 675

FROM: Paul Horng, Ph. D., Environmental Scientist
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INTRODUCTION:

The registrant, Syngenta Crop Protection, Inc., responded to our previous memorandum (Paul Horng; D281281; 5/MAR/02) by submitting additional product chemistry data in MRID # 456724-01; and a draft label received by the Agency on 16/AUG/01; to fulfill the data requirements for reregistration of the end-use product, Weather Block Rodenticide Bait with Bitrex, EPA Reg. No. 100-1055.

The product was originally owned by Zeneca Ag Products. EPA Registration Number was 10182-339. It was acquired by Syngenta Crop Protection, Inc. on 23/FEB/2001.

FINDINGS:

1. The submitted data in MRID # 456724-01 satisfy the data requirements for the Guidelines 63-17 (830-6317, Storage Stability) and 63-20 (830-6320, Corrosion Characteristics). No additional data are required.
2. The submitted CSF, a basic formulation dated 14/AUG/01, has been filled out completely and correctly. The nominal concentration, upper limit, and lower limit of the active and inert ingredients in the CSF comply with the requirement of 40 CFR 158.175. All ingredients claimed in the CSF have been cleared for use in pesticide formulation. The CSF is acceptable.
- 3(a). Except for a minor revision required for the draft label as noted in # 3(b), the active ingredient statement is adequate. The physical and chemical properties data of the product indicate that there is neither physical nor chemical hazard for the product, therefore, no physical or chemical hazards statement is required on the label.
- 3(b). (1) For consistency, the Storage and Disposal statement must be placed in a box of solid line to increase its prominence. (2) The sentence "Do not reuse empty container except for holding additional Weather Block Rodenticide." must be moved and placed directly after the Container Disposal subheading. Which is currently placed after the warning statement "Do not contaminate water, food, or feed by storage and disposal." The revision of the draft label can be done after label review.

RECOMMENDATION:

The registrant has satisfied all product chemistry data requirements for reregistration of this product. The Agency will have no objection to the reregistration of the end-use product, Weather Blok Rodenticide Bait with Bitrex , EPA Reg. No. 100-1055.

Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)

MRID # 440634-01 & 456724-01.

GUIDELINE REFERENCE NO.(GRN)/TITLE 830-	VALUE OR QUALITATIVE DESCRIPTION/ METHODS USED WHERE APPLICABLE AND REFERENCES	Comments
-6302 Color.	Blue color (7.85 B), Munsell value of 2 and chroma of 5.0	A
-6303 Physical State.	Solid at 20°C.	A
-6304 Odor.	Aromatic or garlic-like.	NR
-6314 Oxidation/ Reduction Action.	N/A, none of the components used in the formulation are known to be oxidizing or reducing agents.	N/A
-6315 Flammability.	N/A, the product contains no combustible liquid.	N/A
-6316 Explodability.	N/A, the product contains no explosive agents. No explosive potential is anticipated.	N/A
-6317 Storage Stability.	The test substance approximately 8 pounds was stored in its original container (12.5 pound plastic pail). It was stored in the Cole Grower Warehouse, Madison, Wisconsin. The temperature ranged from 10 to 26°C and the relative humidity ranged from 32 to 84% during one year of storage. The mean concentrations of the active ingredient, brodifacoum, in the product at initial and after one year of storage at ambient temperature of warehouse were found to be 0.0054 and 0.0047%, respectively, after correction of recovery. The concentration of the active ingredient in the product after one year of storage remained within the certified limits range. No change in physical properties were observed. The accuracy and recovery of the analytical method are adequate. The representative HPLC chromatograms are acceptable. MRID # 456724-01.	A
-6319 Miscibility.	N/A, the product is solid and not to be diluted with water.	N/A
-6320 Corrosion Characteristics	The test substance approximately 8 pounds was stored in its original container (12.5 pound plastic pail). It was stored in the Cole Grower Warehouse, Madison, Wisconsin. The temperature ranged from 10 to 26°C and the relative humidity ranged from 32 to 84% during one year of storage. No corrosion on the packaging by the test substance was observed. MRID # 456724-01.	A
-7000 pH.	N/A, the active ingredient (0.005%) is not water soluble. It is formulated with 99.995% solid material [REDACTED]	N/A
-7100 Viscosity.	N/A, the product is not a liquid.	N/A
-7300 Bulk Density	1.20 g/mL at 20°C.	A

A: acceptable; N/A: not applicable; Gap: data gap; NR: not required.

Inert ingredient information not included.

D283407; D281281

PRODIFACON

Page _____ is not included in this copy.

Pages 4 through 5 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.

X _____ Description of the product manufacturing process.

X _____ 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.

_____ Internal deliberative information.

_____ Attorney-Client work product.

_____ Claimed Confidential by submitter upon submission to the Agency.

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.