

DATE OUT: OCT 13 1995

SUBJECT: EP [X] MP [] TECHNICAL [] PRODUCT CHEMISTRY REVIEW
PRODUCT NAME: Etofenprox Aerosol
APPLICANT: 033657 Mitsui Toatsu Chemicals Inc REG#: 33657-0

TO: 13 George LaRocca/Adam Heyward
Insecticide-Rodenticide Branch
Registration Division (7505C)

FROM: Sami Malak, Chemist, 10/4/95 (308-8392) *Sami Malak*
Product Chemistry Review Section
Registration Support Branch/RD (7505W)

THRU: Harold Podall, Section Head *HPC 10/12/95*
Product Chemistry Review Section

SUMMARY OF FINDINGS:

1. The submitted product chemistry data for this end-use product, Etofenprox Aerosol, Reg. No. 33657-0, is adequate.
2. The submitted label for this end-use product, Etofenprox Aerosol, Reg. No. 33657-0, EPA received 5/22/95, is acceptable.
3. The submitted CSF for this end-use product, Etofenprox Aerosol, Reg. No. 33657-0, EPA received 5/22/95, dated 5/16/95 is acceptable. All inert ingredients are cleared for non-food uses.
4. A-70 propellant is not cleared for use. For the purpose of clearance, the registrant should be advised to provide some information on that ingredient as to chemical identity, CAS Registry No., and composition.

RECOMMENDATIONS:

Pending:

- (1) Registration of the technical source, Etofenprox, CAS #80844-07-01, and
2. Resolution of finding 4 above,

we can recommend for registration of this end-use product, Etofenprox Aerosol, Reg. No. 33657-0.

EP [X] MP [] TECHNICAL [] PRODUCT CHEMISTRY REVIEW

1. DP BARCODE No. 216083 : 2. REG./File Symbol No.: 33657-0
3. Registration [X] 4. Reregistration [], Rereg Case No. _____
5. Product Name: Etophenprox Aerosol
6. Pesticide Type: a. Fungicide [] b. Herbicide []
c. Insecticide [X] d. Rodenticide [] e. Antimicrobial []
f. Plant Growth Regulator [] g. Others: _____
7. Uses: a. Food [] b. Non food use [X]
8. Type of Submission: New [X] Resubmission [] Amendment []
"ME-TOO" [] Alternate Formulation [] Repack []
Experimental Use Permit [] Other (Specify) _____
9. If "Me-TOO" Registration, this product is [] is not []
similar or substantially similar to EPA's Reg. No.: _____
- If not, comment in Confidential Appendix A on the differences
between the registered and the new source where significant.
10. Information to be reviewed:
- a. CSF [X]: Basic [X] Alternate []
b. Label [X] c. Product Chemistry [X]

CONFIDENTIAL STATEMENT OF FORMULA, DATED 5/16/95:

11. Type of formulation and the sources of active ingredients:
- a. Non-integrated formulation system.....[X]
- b. Are all technical grade active ingredients used
registered? • yes [] • no [X]
- c. Integrated formulation system..... []
12. Basic Properties:
- a. Physical state at ambient temperature: Liquid
- b. Density (or bulk density for solids)/temperature:
8.1 lb/gal
- c. pH of product: 5.3
- d. Flash point (or flame extension for aerosols): N/A

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13. Composition: The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

Active ingredient(s)	% by weight		
	NC	UCL	LCL
Etofenprox: 2-(4-Ethoxyphenyl)-2-methylpropyl-3-phenoxybenzyl ether, CAS # 80844-07-01.....	1.0	1.05	0.95

14. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:

• yes ☒ [X] • no ☐ []

15. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:

• yes ☒ [X] • no ☐ []

16. Clearance of intentionally added ingredients in the formulation for the intended use:

- a. Formulation intended for food use under 40CFR§180.1001:

• yes ☐ [] • no ☐ [] • Some are cleared, others are not ☐ []

• Cleared under list: • c ☐ [] • d ☐ [] • e ☐ []

• Are there any limitations for use as an inert under 40CFR§180.1001?

• yes ☐ [] • no ☐ [], If yes, specify: _____

- b. Formulation intended for non-food use:

• yes ☒ [X] • no ☐ [] • Some are cleared, others are not ☒ [X]

- c. Clearance by the FDA of certain formulations under 21CFR §170 to 199.

• yes ☐ [] • no ☐ [] • Some are cleared, others are not ☐ []

If yes, the entire formulation is cleared under 21CFR§_____

17. For products produced by an integrated formulation system:

• All impurities of toxicological significance have an UCL:

• yes ☐ [] • no ☐ [] • not applicable ☐ []

• All other impurities $\geq 0.1\%$ associated with the active ingredient in the product are reported at their nominal

concentrations:

• yes [] • no [] • not applicable []

PRODUCT LABEL, EPA RECEIVED 5/22/95:

18. The active ingredients statement (chemical identities, nominal concentrations) is consistent with the CSF • yes [X] • no []
19. The formulation contains one of the following:
- 10% or more of a petroleum distillate: • yes [] • no [X]
 - 1% or more of methyl alcohol: • yes [] • no [X]
 - sodium nitrite at any level: • yes [] • no [X]
 - a toxic List 1 inert at any level: • yes [] • no [X]
 - arsenic in any form: • yes [] • no [X]
20. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this?
- yes [] • no [] • not applicable []
21. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:
- yes [X] • no [] • not applicable []
22. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses:
- yes [X] • no []

PRODUCT CHEMISTRY DATA (SERIES 61 and 62)

23. <u>Chemical IDs/Manufacture/</u> <u>Analytical Information</u>	<u>Data</u> <u>Required</u> <u>Fulfilled</u>	<u>MRID No.</u>
61-1 Chemical Identity	Y	436629-01
61-2 Starting Materials & Manufact or Formulation Process	Y	436629-01
61-3 Discussion of Impurities	Y	436629-01
62-1 Preliminary Analysis	Y	436629-01
62-2 Certified Limits	Y	436629-02
62-3 Enforcement Analytical Method	Y	436629-01

PRODUCT CHEMISTRY DATA (SERIES 63)

24. <u>Physical/Chemical Properties</u>	<u>Data Required Fulfilled</u>	<u>Value or Qualitative Description</u>	<u>SOURCE OR MRID NO</u>
63-3 Physical State	Y	Liquid	436629-02
63-7 Density/Bulk Density	Y	8.1 Lbs/gal.	436629-02
63-12 pH of Product	Y	5.3	436629-02
63-15a Flammability-Flash Point	NA		
63-15b Flame Extension	NA		
63-16 Explodability	Y	not-explosive under normal use and storage conditions.	436629-02
63-17 Storage Stability	Y	Stable	436629-02
63-18 Viscosity	NA		
63-19 Miscibility (With Hydrocarbon solvents)	NA		
63-20 Corrosion Characteristics	Y	non-corrosive to tinplate steel or aerosol cans and valves.	436629-02
63-21 Dielectric Breakdown Voltage	NA		

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

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