



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

MAR 23 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Product Chemistry Review On New Chemicals
EPA File Symbols 1812-GEO, 1812-GGN, 1812-GET

FROM: Treva C. Alston, Chemist
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Registration Support Branch
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A handwritten signature in cursive script, reading "Treva C. Alston".

TO: Phil Hutton, PM 17
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THRU: Alfred Smith
Product Chemistry Review Section
Registration Support Branch
Registration Division (H7505C)

A handwritten signature in cursive script, reading "Alfred Smith".

THRU: Ferial S. Bishop, Chief
Registration Support Branch
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Requestor: Griffin Corporation

EPA File Symbols: 1812-GEO, 1812-GGN, 1812-GET

EPA Accession Nos.: 408859-01, 408859-02, 408859-03

Pesticide Chemical Code: 128992

CAS Registry No.: 4151-50-2

Chemical Name: N-Ethyl Perfluorooctanesulfonamide

Common/Trade Name: GX-071

Use: Insecticide

Introduction

This submission is in response to deficiencies identified in the product chemistry review of February 23, 1989 for GX-071 Technical and end-use products, Raid Ant Controller II and Raid Roach Controller II. Each of these contain the active ingredient N-ethyl perfluorooctane-sulfonamide. In this submission, only those sections in which deficiencies were identified in a previous review are discussed.

Product Identity and Composition

61-2 - Beginning Materials and Manufacturing Process (GX-071)

Material Safety Data Sheets for [REDACTED] have been submitted. No additional information is required on this topic.

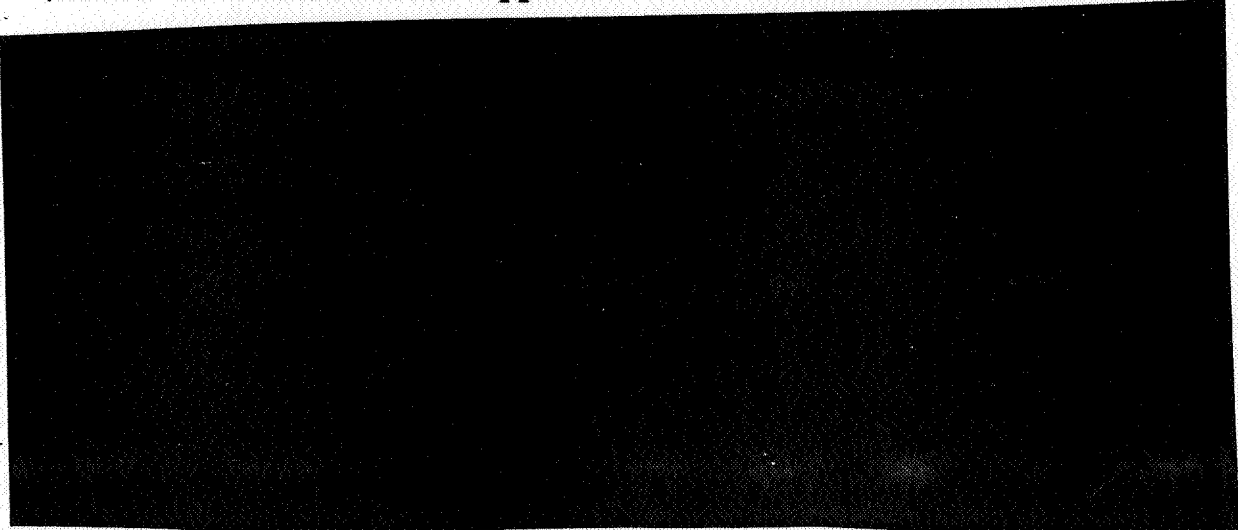
61-2 - Beginning Materials and Manufacturing Process (Raid Ant and Roach Controller II)

Refer to Confidential Appendix A for a description of the alternate formulations for the end-use products, Raid Roach Controller II and Raid Ant Controller II. No additional information is required on this topic.

Analysis & Certification of Product Ingredients

62-1 - Preliminary Analysis

Analytical methods and batch analysis test results from a commercial run of the GX-071 Technical were submitted. (Refer to Confidential Appendix B for results).



62-2 - Certification of Ingredient Limits

A corrected Confidential Statement of Formula (CSF) (EPA Form 8570-4) for Raid Ant Controller II alternate formulation was submitted. See Confidential Appendix B for disclosure of ingredients. No additional information is required.

63 - Physical and Chemical Characteristics

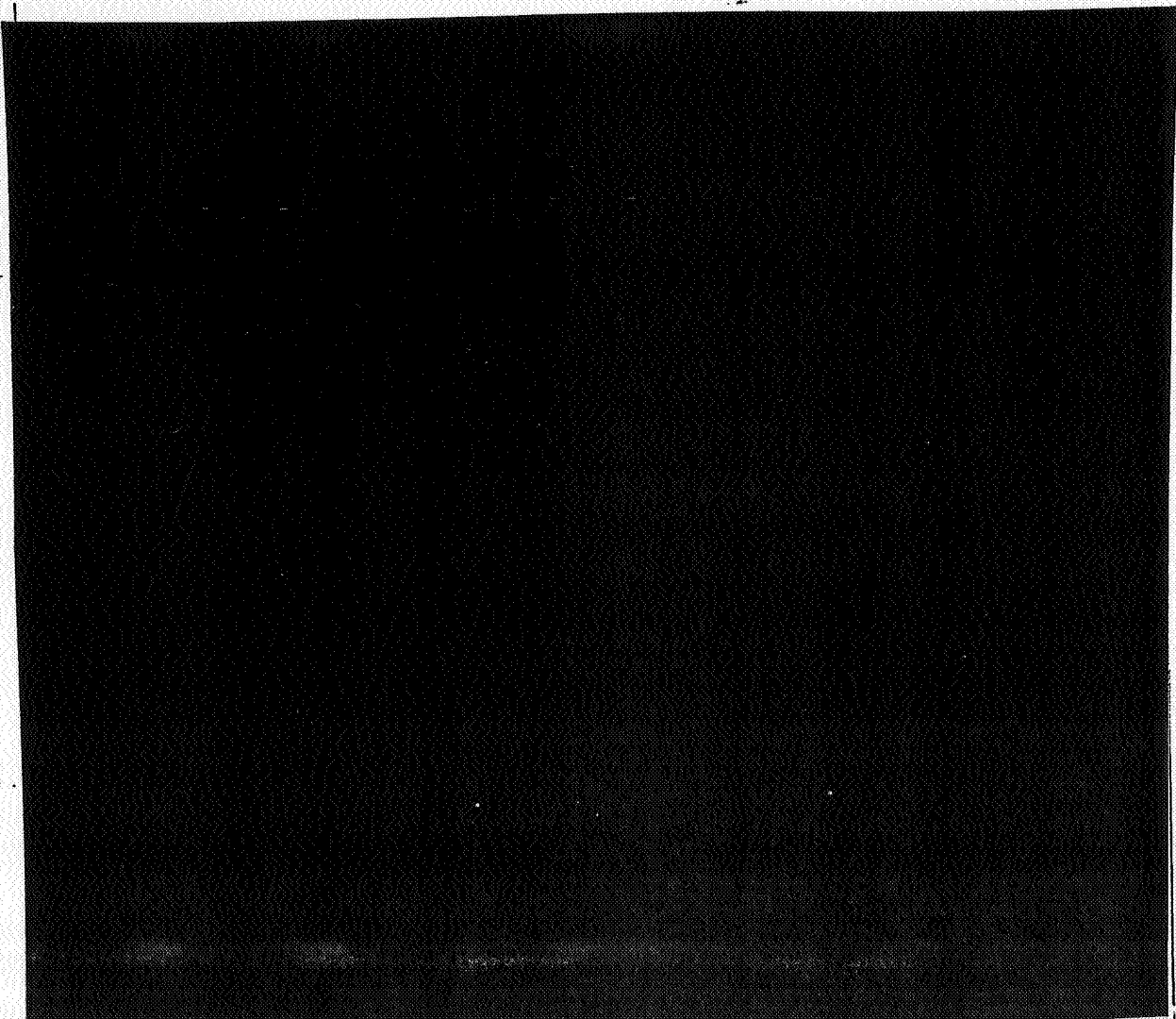
Guidelines Reference No.
(40 CFR 158.120) and
Name of Property

Description

63-5 - Melting Point

Thermogravimetric analysis/
data of TGAI presented to
show sublimation occurs at
elevated temperatures in
non enclosed container (see
below).

QUALITY CONTROL INFORMATION IS NOT INCLUDED



NOTE TO PM:

The sublimation issue of the active ingredient from the end-use product will be addressed by the Non-Dietary Exposure Branch of the Health Effects Division.

Therefore, the product chemistry deficiencies identified in the February 23rd Product Chemistry Review relating to sublimation of the active ingredient have been resolved.

Protocol and data were submitted to support the claim that this end product is in a child-resistant package.

Recommendation

The product chemistry requirements for the technical grade active ingredient and the end-use products have been fulfilled.