



U. S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

December 28, 2000

Fred Hageman
Crop Protection R & D
Uniroyal Chemical Co. Inc.
74 Amity Road
Bethany, CT 06524-3402

S-587944
S-587943
S-585682

**Subject: EPA Reg. No. 400-480; Bifenazate Technical
Amendment to Confidential Statement of Formula
Letters dated 09/06, 10/16 and 10/27/2000**

Dear Mr. Hageman:

Your application to amend the Confidential Statement of Formula (CSF) of Bifenazate Technical to replace the 91.7% active ingredient (AI) with an AI of 96.7% purity was reviewed by the Agency. The submitted product chemistry data is adequate except for certain deficiencies in the physical-chemical properties (color, physical state, stability, oxidation/reduction, storage stability, corrosion characteristics, pH and density). The CSF dated 11/15/99 and the label are acceptable provided that you:

1. Submit the required physical-chemical properties data within 18 months of this approval. All the listed deficiencies are up-gradable or require only a few months to complete except for the combined storage stability-corrosion study, which takes a year.
2. Make the following changes on the label:
 - a. Delete "COMPOSITION" above the Active Ingredient section.
 - b. Replace "dully" in the first sentence (third paragraph) with "duly" and "thie" in the last sentence with "their."
 - c. Provide an Establishment No. at the bottom of the page.

EPA Reg. No. 400-480 contd ...

A stamped copy of the draft label and a copy of the product chemistry review is attached for your reference. Submit one (1) copy of the final printed labeling before you release the product for shipment. Should you have any questions, do not hesitate to contact me at 703-605-0368.

Sincerely,



S. Oonnithan, Ph.D.
Entomologist; RD/IRB (7505C)
Office of Pesticide Programs

Encl.

BIFENAZATE TECHNICAL

**UNIROYAL
CHEMICAL**

ACCEPTED
with COMMENTS
In EPA Letter Dated:

DEC 29 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the product
registered under EPA Reg. No. 400-480

COMPOSITION

ACTIVE INGREDIENT: (% by weight)	
Bifenazate: Hydrazine carboxylic acid, 2-(4-methoxy-[1,1-biphenyl]-3-yl)-1-methylethyl ester	96.7%
INERT INGREDIENTS:	3.3%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not contaminate water when disposing of equipment washwaters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL or CHEMICAL HAZARDS

Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a dry location.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Fiber cartons with liners or bags: Completely empty liner or bag by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner or bag in a sanitary landfill or by incineration if permitted by State and local authorities. Dispose of carton in same manner.

DIRECTIONS FOR USE

Do not use in a manner inconsistent with its labeling.

Only for formulation into acaricides (1) for use on Ornamentals, Cotton, Stone Fruit (except for Cherries), Pome Fruit, Grapes, Hops and Strawberries; (2) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) uses for experimental purposes that are in compliance with USEPA requirements.

This product is for use only by formulators in the manufacture of agricultural acaricidal product(s) offered for sale to the public, and which are fully registered with the Environmental Protection Agency, Washington, D.C. Formulators using this product are responsible for obtaining EPA registration for the formulated product(s).

Detailed information on chemical and physical properties and other formulation recommendations for BIFENAZATE are available upon request from Uniroyal. Obtain and read this information before undertaking the formulation of BIFENAZATE in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Uniroyal Chemical Company, Inc. Any variance from the federal registered labeling for products containing BIFENAZATE will have to be supported by data provided by the formulator.

EMERGENCY ASSISTANCE:	UNIROYAL CHEMICAL EMERGENCY PHONE	203-723-3670
	SAFETY DATA AND INFORMATION	203-573-3303
	TRANSPORTATION EMERGENCY (CHEMTREC)	800-424-9300

IMPORTANT NOTICE - Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but neither this warrant nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product, contrary to label instructions, or under abnormal conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.