6 7526-2

DATE: 22/MAR/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Manufacturing-Use [ ] End-Use Product [X]
DP BARCODE No.D:263042 EPA RECEIVED DATE:09/DEC/1999 REG./File Symbol No.:69526-I
PRODUCT NAME: Spray Oil 15E, 98% Spray Oil MRID.:None
COMPANY NAME: Petro-Canada Action Code:166

FROM: Sami Malak, Chemist
Technical Review Branch/RD (7505C)

TO: 04 Tina Levine/Akiva Abramovitch
Insecticide-Rodenticide Branch/RD (7505C)

INTRODUCTION:

This is re-review of a previous memorandum to consider additional data that was submitted since our previous memorandum (same tracking sheet of D263042, S. Malak, 16/MAR/2000). In our previous memorandum, a request was made for submission of all product chemistry data requirements. Previously, in a letter dated 11/JAN/2000, the applicant requested a FIFRA Section 3(c)(7) conditional registration of subject product. In support of this action, the applicant included product's label, EPA received 09/DEC/1999, CSFs, a basic and two alternate formulations, identified by this reviewer as Alt A & B, all dated 01/DEC/1999, and summary of the physical/chemical properties on EPA Form 8570-36 in compliance with PR Notice 98-1.

FINDINGS:

1. The subject product is produced by a non-integrated formulation system, meaning that the technical source is registered. The product contains 98% petroleum distillates, Reg. No. Reg. No. 69526-3.

2a. The applicant complied with PR Notice 98-1 and submitted a summary of the physical/chemical properties on EPA Form 8570-36. A signed and dated (12/JAN/2000) self-certification statement, EPA Form 8570-37, was also included. Summary of the physical/chemical properties on EPA Form 8570-36 is adequate and is appended to this memorandum (one page).

2b. The applicant should be advised to conduct a minimum of one year storage stability study as per the regulations of Guideline #830-6317 to be submitted if requested as per the regulations of PR Notice 92-5.

2c. Adequate analytical methods are available for enforcement. The methods were previously submitted and reviewed in connection with registration of the technical source, spray oil 22, Reg. No. 69526-3.

2d. The applicant has satisfied product chemistry data requirements for registration of subject

product.

3. The label claim nominal concentration of 98% petroleum distillates is consistent with that on the CSF, both are in compliance with the regulations of PR Notice 91-2. Further, the storage and disposal statement is in compliance with the regulations of 40CFR§156.10. No physical or chemical hazards are anticipated from the subject product.

4. The submitted product's CSFs a basic and two alternate formulations, identified by this reviewer as Alt A & B, all dated 01/DEC/1999, were filled out correctly and completely as per the regulations of PR Notice 91-2. Further, the upper and lower certified limits are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations intended for food uses.

CONCLUSIONS:

We have no objections for a FIFRA Section 3(c)(5) unconditional registration of subject product.

REVIEW OF PRODUCT CHEMISTRY DATA:

1. A statement of data confidentiality dated 01/DEC/1999 was included with this submission claiming confidentiality of some of the data requirements on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C).

2. A GLP statement dated 01/DEC/1999 was included with this submission to the effect that some of the submitted studies were conducted in compliance with GLP requirements of 40CFR§160.

DATA SUBMITTED

Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)

830-1550 Product Identity and Composition

This product contains one registered technical grade of active ingredient plus cleared inert ingredients (refer to product's CSF date 01/DEC/1999).

830-1800 Enforcement Analytical Method:

Adequate analytical methods are available for enforcement. The methods were previously submitted and reviewed in connection with registration of the technical source, spray oil 22, Reg. No. 69526-3.

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

The applicant complied with PR Notice 98-1 and submitted a summary of the physical/chemical properties on EPA Form 8570-36. A signed and dated (12/JAN/2000) self-certification statement, EPA Form 8570-37, was also included. Summary of the physical/chemical properties on EPA Form 8570-36 is adequate and is appended to this memorandum (one page).

830-1600 Description of Materials Used to Produce the Product:

One registered technical grade of active ingredient plus cleared inert ingredients (refer to product's CSF dated 01/DEC/1999).

830-1650 Description of Formulation Process:

This product was formulated using a mixture of one registered technical grade of one active ingredient plus cleared inert ingredients (refer to product's CSF dated 01/DEC/1999).

830-1670 Discussion of Formation of Impurities:

The applicant reported no impurities $\geq$0.1% by weight were known to be formed during formulation and storage of the product.

830-1700 Preliminary Analysis:

Not required for non-integrated products.

830-1750 Certified Limits:

The applicant reported the same ingredients at percentages and low/upper limits as those reported on product's CSF.

cc: S. Malak and Central File (Reg. No. 69526-I).
7505C:RD:TRB:CM-2:Rm.268:s.m.:22/MAR/2000:703-308-9365: <69526-I>.

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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INERT INGREDIENT INFORMATION IS NOT INCLUDED

SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)

1. PRODUCT NAME: Spray Oil 22E - product contains [redacted]		2. Reg. No. 69526-I
3. COMPANY NAME: Petro Canada Lubricants		4. SUBMISSION DATE: Jan 12, 2000
5. FIRST SUBMISSION [ ] 6. RESUBMISSION [X]	7. PESTICIDE TYPE: pesticide / miticide	10. REGISTRATION [X]
8. FORMULATED MANUFACTURING-USE PRODUCT [ ] or 9. END-USE PRODUCT [X]		11. REREGISTRATION [ ]
13. PRODUCT MANAGER OR CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN): Sami Malak		12. REREG CASE #
14. GUIDELINE REFERENCE NO./GRN/TITLE	15. VALUE or QUALITATIVE DESCRIPTION/METHOD(s) USED WHERE APPLICABLE AND REFERENCES	16. MRID or REPORT NO.

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

-6302	Color	Water White	PCL-01
-6303	Physical State	Liquid @ 20C	PCL-01
-6304	Odor	No Discernible Odor	PCL-01
-6314	Oxidation/Reduction: Chemical Incompatibility	No reaction when sample was tested against Zinc Powder. Sample dissolved in gasoline and formed distinct layer when mixed with MAP, commercial bleach, and tap water.	PCL-01
-6315	Flammability/Flame Extension	The sample did not flash up to 220F	PCL-01
-6316	Explodability	In DARTEC Inc's opinion, the sample contains no potentially explosive components	PCL-01
-6317	Storage Stability	No change in concentrations based on FTIR spectra between initial and 1 month periods when stored at ambient warehouse conditions in white HDPE containers. Also, only minor changes in viscosity and density were observed	PCL-01
-6319	Miscibility	Not applicable. Product is not an emulsifiable liquid to be diluted with oil or non polar solvents.	PLC-01
-6320	Corrosion Characteristics	Aluminum: +0.0098 mils/year; Carbon Steel: +0.0135 mils/year; Stainless Steel: +0.0135 mils/year. High density polypropylene : +4.1504 mils/year (+ = gain)	PLC-01
-6321	Dielectric Breakdown Voltage	Not applicable. Product is not labeled for use around electrical equipment.	PLC-01
-7000	pH	The pH is 4.95 (1% v/v aqueous mixture) @20C.	PLC-01
-7100	Viscosity	Visc@20C, 2.5 RPM / 5.0 RPM / 10 RPM Initial 49.7 / 49.051 / 48.7; 1 Month 49.6 / 49.4 / 49.2	PLC-01
-7300	Density/Relative Density/ Bulk Density	Initial density - 0.8528 g/ml; One month 0.8524 g/ml	PLC-01

EPA Form 8570-36 (07/JAN/1998)

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SELF-CERTIFICATION STATEMENT FOR THE PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)

Product Name: Spray Oil 22E - product contains [redacted]

Reg. No./File Symbol No. (if known) or Company No. 69526-I

SELF-CERTIFICATION STATEMENT:

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name): DARTEC INC. _____ and that the values of the properties reported are reliable. I further certify that such data was generated in substantial conformity with OPPTS Test Guidelines Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name: Dr Michael Fefer	
Title: Sr. Product Specialist	Telephone No. 905-804-4693
Applicant's Signature:	Date: Jan. 12, 2000

EPA Form 8570-37 (07/JAN/1998)

INERT INGREDIENT INFORMATION IS NOT INCLUDED

Attach-2

4

DATE: 16/MAR/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Manufacturing-Use [ ] End-Use Product [X]
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FROM: Sami Malak, Chemist
Technical Review Branch/RD (7505C)

TO: 04 Tina Levine/Akiva Abramovitch
Insecticide-Rodenticide Branch/RD (7505C)

INTRODUCTION:

In a letter dated 11/JAN/2000, the applicant requested a FIFRA Section 3(c)(7) conditional registration of subject product. In support of this action, the applicant included product's label, EPA received 09/DEC/1999, and CSFs, a basic and two alternate formulations all dated 01/DEC/1999. No product chemistry data was submitted.

FINDINGS:

1. The subject product is produced by a non-integrated formulation system, meaning that the technical source is registered. The product contains 98% petroleum distillates, Reg. No. 69526-3.

2. The applicant should be advised to submit/reference applicable product chemistry data requirements for registration of subject product.

3, Review of product's label and CSFs is contingent upon submission of the data requirements for registration.

CONCLUSIONS:

We objections to this action because of Findings 1 & 2 above.

cc: S. Malak and Central File (Reg. No. 69526-I).
7505C:RD:TRB:CM-2:Rm.268:s.m.:16/MAR/2000:703-308-9365:<69526-I>.