

SEPA Reregistration 540/RS-93-231 **Eligibility Document** (RED)

Soap Salts

REREGISTRATION ELIGIBILITY DOCUMENT

Soap Salts

LIST D

CASE 4083

ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDE PROGRAMS
SPECIAL REVIEW AND REREGISTRATION DIVISION
WASHINGTON, D.C.

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Application for Registration

GLOSSARY OF TERMS AND ABBREVIATIONS

A.I. Active Ingredient

CAS Chemical Abstracts Service

CFR Code of Federal Regulations

CSF Confidential Statement of Formula

EPA U.S. Environmental Protection Agency

EP End-Use Product

FDA Food and Drug Administration

FIFRA Federal Insecticide, Fungicide, and Rodenticide Act

GRAS Generally Recognized As Safe

LC₅₀ Median Lethal Concentration. A statistically derived concentration of a substance that can be expected to cause death in 50% of test animals. It is usually expressed as the mass of substance per body mass of animal or volume of water or feed, e.g., mg/l or ppm.

LD₅₀ Median Lethal Dose. A statistically derived single dose that can be expected to cause death in 50% of the test animals when administered by the route indicated (oral, dermal, inhalation). It is expressed as a mass of substance per unit mass of animal, e.g. mg/kg.

MRID Master Record Identification (number). EPA's system of recording and tracking studies submitted to the EPA.

ppm Parts per Million

RED Reregistration Eligibility Document

TGAI Technical Grade of the Active Ingredient

EXECUTIVE SUMMARY

This Reregistration Eligibility Document (RED) addresses the pesticide active ingredients potassium and ammonium salts of fatty acids and their uses in the chemical case soap salts. Soap salts-containing products are currently registered as acaricides, algaecides, herbicides, insecticides and animal repellents. They are intended for either residential or commercial use. All applicable products containing potassium or ammonium salts of fatty acids as active ingredients and that registered for these uses are eligible for reregistration.

The U.S. Environmental Protection Agency (EPA) has conducted a review of the scientific data base and other relevant information supporting the reregistration of soap salts and has determined that the data base is sufficient to allow EPA to make a reregistration eligibility decision. All data requirements have been submitted or waived for these active ingredients.

Accordingly, EPA has determined that all products containing potassium or ammonium salts of fatty acids as the active ingredient are eligible for reregistration and will be reregistered when acceptable labeling and product specific data are submitted and/or cited. Before reregistering each product, the EPA is requiring that product specific data and revised labeling be submitted by the registrants within eight months of the issuance of this document. After reviewing these data and the revised labels, EPA will determine whether or not the conditions of FIFRA 3(c)(5) have been met, that is, whether product composition and labeling are acceptable and the product's uses will not cause unreasonable adverse effects to humans or the environment. If these conditions are met, EPA will reregister the product. Any end-use product containing soap salts in combination with other active ingredients will not be reregistered until the Agency issues reregistration eligibility decisions for all active ingredients contained in that product.

I. INTRODUCTION

In 1988, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) was amended to accelerate the reregistration of products with active ingredients registered prior to November 1, 1984. The amended Act provides a schedule for the reregistration process to be completed in nine years. There are five phases to the reregistration process. The first four phases of the process focus on identification of data requirements to support the reregistration of an active ingredient and the generation and submission of data to fulfill the requirements. The fifth phase is a review by the U.S. Environmental Protection Agency (referred to as "the Agency") of all data submitted to support reregistration.

FIFRA Section 4(g)(2)(A) states that in Phase 5 "the Administrator shall determine whether pesticides containing such active ingredient are eligible for reregistration" before calling in data on products and either reregistering products or taking "other appropriate regulatory action." Thus, reregistration involves a thorough review of the scientific data base underlying a pesticide's registration. The purpose of the Agency's review is to reassess the potential hazards arising from the currently registered uses of the pesticide; to determine the need for additional data on health and environmental effects; and to determine whether the pesticide meets the "no unreasonable adverse effects" criterion of FIFRA.

This document presents the Agency's decision regarding the eligibility for reregistration of soap salts. The document consists of six sections. Section I is the introduction. Section II describes soap salts, their uses, data requirements and regulatory history. Section III discusses the human health and environmental assessment based on the data available to the Agency. Section IV discusses the eligibility for reregistration decision for soap salts. Section V discusses the reregistration requirements for soap salts. Section VI is the Appendices which support this Reregistration Eligibility Document. Additional details concerning the Agency's review of applicable data are available on request.

¹ EPA's reviews of data on the set of registered uses considered for EPA's analysis may be obtained from the OPP Public Docket, Field Operations Division (H7506C), Office of Pesticide Programs, EPA, Washington, DC 20460.

II. CASE OVERVIEW

A. Chemical Overview

The active ingredients potassium and ammonium salts of fatty acids are covered by this Reregistration Eligibility Document.

1. Chemical Name: Potassium salts of fatty acids $[C_{12}-C_{12}]$ saturated and C_{12} unsaturated], including potassium laureate, potassium myristate, potassium oleate and potassium ricinoleate.

CAS Registry Number: 10124-65-9

Office of Pesticide Programs Chemical Code: 0079201

Empirical Formula: [C₁₂-C₁₈ H_x-H_y O_x-O_y]K

2. Chemical Name: Ammonium salts of higher fatty acids [C₂-C₁₂ saturated and C₁₂ unsaturated], including ammonium oleate.

CAS Registry Number: 84776-33-0

Office of Pesticide Programs Chemical Code: 031801

Empirical Formula: [C₁-C₁₈ H_x-H_y O_x-O_y]NH₄

B. Use Profile For Potassium Salts of Fatty Acids

Mechanism of Action: Insects-- Disrupts the integrity of the exoskeleton by dissolving portions, causing body fluids to exude from the body and ultimately, death. Plants--Disrupts the photosynthetic process, thereby killing the plant.

Use Sites:

Terrestrial Food+Feed Crops: Beans, peas, tomatoes, white potatoes, seed and pod vegetables and other unspecified vegetables; nut crop/nut trees, citrus, pome fruits, subtropical fruits, grapes, trees and other unspecified fruit; and cotton.

Terrestrial Food Crops: Broccoli, brussels sprouts, cabbage, cauliflower, cucumber, eggplant, lettuce, melons, okra, pepper, pumpkins, radish, squash (summer), squash

(winter), squash (zucchini), asparagus, and stone fruits.

Greenhouse Food Crops: fruit trees and other unspecified fruits.

Terrestrial Greenhouse Food Crops: asparagus, cucurbits, flavoring and spice crops, fruiting vegetables, leafy vegetables, root crop vegetables and other unspecified vegetables.

Indoor Residential: Adult dogs, puppies and cats.

Outdoor Residential: Walks, driveways, ornamental flower beds, trees and shrubs.

Pests:

Spider mites, whiteflies, aphids, squash bugs, flea beetles, green stink bugs, cabbageworms, leafhoppers, lace bugs, mealybugs, earwigs, grasshoppers, plant bugs, psyllids, sawfly larvae, scales, tent caterpillars, thrips, fleas, sarcoptic mange mites, wasp, hornets and ants. The potassium salts are also labeled to control mosses, algae, lichens, liverworts, and unspecified weeds.

Formulation Types Registered: Liquid and Solid

Single Active Ingredient Products:

Liquid concentrates: 18 to 50.5% potassium salts of fatty acids.

Solid Soap Cake: 25.0% potassium salts of fatty acids.

Ready to Use Sprays: 1.0 to 3.0% potassium salts of fatty acids.

Multiple Active Ingredient Products:

Solid soap cake: 89.0% potassium salts of fatty acids, 0.120% petroleum distillate, 0.084 N-Octyl bicycloheptene dicarboximide, 0.05% piperonal butoxide technical and 0.025% pyrethrins.

Liquid concentrates: 20.0% potassium salts of fatty acids, and 0.20% pyrethrins.

Ointment: 7.5% soap (anhydrous) and 30% benzyl benzoate.

Ready to Use Spray: 1.0% potassium salts of fatty acids and 0.01% pyrethrins.

Methods and Rates of Application:

Products containing potassium salts of fatty acids are applied as sprays, in a solid form ("soap cake"), and as an ointment. For specifics in application methods and rates on

application methods and rates, please refer to Appendix A.

Limitations: None

C. Use Profile for Ammonium Salts of Fatty Acids

Mechanism of Action: Negatively affects the olfactory nerves of deer and rabbits.

Use Sites:

Terrestrial Food+Feed Crops: Grapes, cereal grains, unspecified vegetables, unspecified orchards, unspecified field crops, grass forage/fodder/hay and non-grass forage/fodder/hay.

Terrestrial Non-Food Crops: Ornamental herbaceous plants, ornamental lawns and turf, ornamental woody shrubs and vines and ornamental shade trees.

Pests:

Deer and rabbits

Formulation Type Registered: Liquid

Single Active Ingredient Products:

Liquid concentrates: 15.0% ammonium soaps of higher fatty acids.

Methods and Rates of Application:

Because of the variation in rates and methods of application of this chemical, please refer to Appendix A for methods and rates of application.

Limitations: Do not apply product through any type of irrigation system. Product is not compatible with soluble metallic salts such as zinc, manganese, and iron sulfates.

D. Regulatory History

The first soap salts product with pesticidal uses was registered in 1947. Currently there are twenty four "soap" products registered. The May 5, 1990 Federal Register publication of List D chemicals subject to reregistration, Soap Salts, case 4083, included

soap, oleic acid, sodium oleate, ammonium oleate, potassium laureate, potassium myristate, potassium oleate and potassium ricinoleate. However previously in March of 1989 the Agency determined, "all potassium salts of fatty acids, and all combinations of these chemicals, to be a 'single active ingredient' for purposes of pesticide registration." An Agency review of May 4, 1992 determined that this position would only include potassium salts of C₁₂-C₁₈, saturated and unsaturated. "Any other chain length (either shorter or longer) should be considered a different active ingredient for registration purposes." Presently, of those chemicals included in Case 4083, only two active ingredients described above are currently associated with active product registrations. Products containing the remaining chemicals contained in this case (soap, as discussed below, oleic acid, and sodium oleate), are cancelled and these active ingredients have been removed from the list of chemicals subject to reregistration.

EPA published in the Federal Register of January 13, 1982 " an exemption from the requirement of a tolerance for residues of the insecticide potassium oleate and related C₁₂-C₁₉ fatty acid potassium salts in or on all raw agricultural commodities when applied in accordance with good agricultural practices."

The Thompson-Hayward Chemical Company submitted an amendment to add food uses to the label of their registered product (EPA Reg. No. 1148-13) in July of 1979. This product, which was transferred December 29, 1982 to the Uniroyal Chemical Company (EPA Reg. No. 400-383) contains ammonium salts of fatty acids as the active ingredient. The Thompson-Hayward Company made a formal request for an exemption from the requirement of a tolerance for ammonium salts of fatty acids in a letter to the Agency dated September 10, 1980. The request was reviewed by the Agency which had no objections to the addition of food uses but required results of an inhalation test which was submitted and found acceptable. The addition of food uses was accepted in 1982.

Though the company made a formal request for an exemption of ammonium salts of fatty acids from the requirement of a tolerance and the Agency reviewed the data, a formal notice was not drafted and published in the Federal Register. To correct that oversight the Agency will draft a proposed exemption from tolerance and publish it in the Federal Register.

In the Federal Register Notice of May 4, 1988 and as set forth in 40 CFR §153.139, the Agency determined that "soap", "has no independent pesticidal activity when included in antimicrobial products for the designated uses, and thus is properly classified as an inert ingredient." Because EPA has determined that "soap" compounds is not an active ingredient but rather an inert in antimicrobial products, such products are not subject to the Soap Salts Reregistration Eligibility Document.

In accordance with the Pine Oil Label Improvement Program (Federal Register dated June 5, 1980 and PR Notice 80-1) the majority of labels for these antimicrobial products were revised to include "soap" as an inert ingredient. The Agency has issued a letter on May 5, 1992 notifying registrants of antimicrobial products that still have "soap" listed under

the active ingredient statement that the label and Confidential Statement of Formula must be amended to delete "soap" from the active ingredient statement.

Although most registrants of antimicrobial products listing "soap" as an active ingredient have voluntarily amended their registrations to redesignate soap as inert, there remain a small number of registered antimicrobial products for which an amendment to effect this change has not been submitted to the EPA. While these products are not subject to the data requirements of the Soap Salts Reregistration Eligibility Document, the registrants of the products are being notified that the Agency considers antimicrobial products with "soap" listed on the label as an active ingredient to be misbranded under section 2(q)(1)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Accordingly, unless these product labels are amended to delete soap as an active ingredient, the Agency may bring misbranding action under section 12(a)(1)(E) of FIFRA or may cancel such products under 6(b) of FIFRA.

The Food and Drug Administration lists salts of fatty acids, except ammonium, as additives that may be safely used in foods. This denotation appears in 21 CFR §172.863.

III. SCIENCE ASSESSMENT OF SOAP SALTS

The Agency has reviewed the scientific data base for soap salts, primarily relying on information from published literature submitted by the registrant. These sources of information are cited in Appendix C.

A. Product Chemistry Assessment

In the May 5, 1990 Federal Register publication of List D chemicals, Soap Salts, case 4083, included soap, oleic acid, ammonium oleate, sodium oleate, potassium laureate, potassium myristate, potassium oleate and potassium ricinoleate. By definition "ordinary soap is a mixture of the sodium salts of various fatty acids of natural oils and fats. It is made by heating oils with caustic soda, salting out the soluble soap formed, and drawing off the dilute glycerol produced. Thus, common soap is largely a mixture of the sodium salts of palmitic, stearic and oleic acids. The term soap is also applied to individual components such as sodium palmitate, sodium stearate, etc. If another metal or basic radical is present instead of sodium, a modified term such as potash soap, calcium soap or amine soap is used (1). This latter category also includes ammonium soaps (ammonium salts of fatty acids).

Case 4083, soap salts, are comprised of only two active ingredients which are currently associated with active product registrations. These two chemicals are: (1) ammonium salts of [C8-C18 saturated and C18 unsaturated] fatty acids, including

ammonium oleate; and, (2) potassium salts of [C12-C18 saturated and C₁₈ unsaturated] fatty acids, including potassium laureate, potassium myristate, potassium oleate, and potassium ricinoleate.

The technical grade of the active ingredient (TGAI) <u>per se</u> is not isolated during the manufacturing process. Given that these active ingredients are exempt from the requirement of a tolerance (40 CFR §180.1068), the Agency has not required generic data requirements to be satisfied using the TGAI as the test substance.

B. Human Health Assessment

1. Toxicology Data Base

The toxicological data base on soap salts is adequate and will support reregistration eligibility of the active ingredients.

a. Acute Toxicity

TEST	ACUTE TOXICITY DATA
	EFFECT, CATEGORY
Oral LD50	IV
Dermal LD50	IV
Eye effects	Irritation
Skin effects	Mild - moderate irritation; Non-sensitizing

Oral exposure to soaps is generally self-limiting because the taste of soap is easily recognized and unpleasant. The ammonium soap salts also have a notable ammonia odor that is limiting. Fatty acids such as oleic acid and related C_{12} — C_{18} fatty acids are generally considered to be of low toxicity by the oral route of exposure, and potassium salts of these fatty acids are not expected to be very toxic. The oral LD50 for oleic acid in rats was 74 g/kg (14).

On human skin, 2.5 mg of soap for 24 hours caused moderate irritation; and 10 mg of soap on rabbit skin caused mild irritation (14). On human skin, 11,800 mg of the potassium salt of palmitic acid was irritating (15). For the potassium salt of caprylic acid, 7320 mg was irritating on human skin (15). Stearic acid was mildly irritating to human skin when 75 mg was applied intermittently for 3 days (15). On rabbit skin, 500 mg of stearic

acid applied for 24 hours was moderately irritating (15). Oleic acid was moderately irritating to human skin when 15 mg was applied intermittently for 3 days; and mildly irritating to rabbit skin when 500 mg was applied (14).

The potassium salt of oleic acid was irritating when 12 mg were placed in rabbit eyes (48 hours) (14,15).

b. Metabolism

Fatty acids are normally metabolized by the cells, where they are oxidized to simple compounds for use as energy sources and as structural components utilized in all living cells. Potassium, sodium and ammonium are normally part of the body's metabolism and electrolyte balance.

c. Reproduction and Developmental Toxicity

When given to mice on days 2-13 of pregnancy, the potassium salts of coco fatty acids were reported to have an effect on post-implantation mortality at 6 gm/kg, and to cause musculo-skeletal system abnormalities at 600 mg/kg (15).

d. Mutagenicity

DNA inhibition was reported with 600 umol/l of the sodium salt of caprylic acid, tested with guinea pig kidney cells (15). Unscheduled DNA synthesis was found in mouse cells with 35 mg/kg of oleic acid (14). Cytogenetic analysis was positive for 2500 ug/L of oleic acid with hamster fibroblasts and for 100 mg/L with Saccharomyces cerevisiae (14).

2. Dietary Exposure

There is a tolerance exemption for potassium oleate and related C_{12} - C_{13} fatty acid potassium salts [40 CFR §180.1068]. Salts of fatty acids (not including ammonium salts) are food additives [21 CFR §172.863]. Residue chemistry data requirements are not applicable due to the tolerance exemption. While there are registered food uses for ammonium salts of fatty acids, there is neither a tolerance nor a tolerance exemption for these salts under 40 CFR Section 180. The Agency will correct this discrepancy by proposing a tolerance exemption.

3. Occupational and Residential Exposure

Products containing potassium salts of selected fatty acids are used on various crops, shrubs and trees, as well as household plants. Other uses include moss control in lawns as well as control of algae, lichens, and liverworts on roofs, walks, and fences, and in

greenhouses. Ammonium salts of fatty acids are used as a rabbit and deer repellent on forage and grain crops, vegetables and field crops (unspecified), non-crop areas, nursery stock and ornamentals, flowers, roses, shrubs, fruit trees and vines.

The end-use product labels for the potassium salts of fatty acids bear the signal word "CAUTION" and do not recommend any measures to reduce exposure. The labels for the two end-use product labels for the ammonium soaps of higher fatty acids bear the signal word "DANGER" due to potential eye irritation and require that users wear protective eyewear, i.e., glasses, goggles, or faceshield, to protect against ocular exposure. The products may also cause allergic skin reactions in some individuals, however, no measures are recommended to reduce skin exposure because the Agency believes allergic reactions are uncommon and transient.

The toxicological data base on these soap salts is adequate and will support reregistration. Because the toxicity of these chemicals is generally low, the Agency is not requiring any exposure data. Exposure to users during application can be significant, but soaps generally have low toxicity to humans and, there is no reason to expect that pesticide use in accordance with use directions would constitute any significant hazard. Protective eyewear is required for ammonium soap salt products to mitigate potential ocular exposure and irritation for the ammonium salts of fatty acids.

4. Risk Assessment

Soaps are mineral salts of naturally occurring fatty acids. The fatty acids are a significant part of the normal daily diet, for they occur in dietary lipids which usually constitute about 90 grams in a day's diet. Residues from the pesticide uses are not likely to exceed levels of naturally occurring fatty acids in commonly eaten foods. The Food and Drug Administration lists salts of fatty acids, including the potassium salts, as additives that may be used as binders, emulsifiers, and anticking agents in food (21 CFR 172.863). Also, FDA lists oleic acid derived from tall oil fatty acids (21 CFR 172.862), and lists fatty acids, including capric, caprylic, lauric, myristic, oleic, palmitic, and stearic acids, (21 CFR 172.860) as additives that may be safely used in foods. Stearic acid is generally recognized as safe for use as an ingredient in food (21 CFR 184.1090). A number of fatty acid salts are prior sanctioned for uses in food packaging materials (21 CFR 181).

Because of the low acute toxicity (toxicity category IV) of soap salts via oral and dermal routes, and because residues from the pesticide uses are not likely to exceed levels of naturally occurring or intentionally added fatty acids in commonly eaten foods, the Agency believes the risks to applicators and consumers of treated foods are negligible. There is a risk of permanent eye injury to applicators but this risk can be mitigated by the use of eye wear protection, i.e., safety glasses, goggles or a faceshield. Protective eyewear is required for ammonium soap salt products to mitigate potential ocular exposure and irritation.

C. Environmental Assessment

The Agency has reviewed the data base for environmental effects for potassium and ammonium salts of fatty acids and has determined that the data base is adequate and will support reregistration.

1. Environmental Fate Assessment

Hydrolysis of potassium salts of fatty acids was shown not to occur over a period of 43 days (MRID 00164005). This is consistent with the literature on fatty acids, which indicates that the primary environmental degradation route of fatty acids is by microfloral action (the cleavage of the carbon chain of fatty acids by oxidative chemistry) as opposed to hydrolysis. Due to the similarity of chemical structure, it is expected that hydrolysis of the ammonium salts of fatty acid would be similar to that of the potassium salts of fatty acids.

Studies submitted to the Agency indicate that the half-life of these fatty acids is approximately less than one day (MRID 00157476). As can be expected, there is very rapid microbial degradation of fatty acids in soil. Fatty acids and their salts are excellent substrate for microbial growth, serving both as carbon sources, and as energy sources. The active ingredient cannot totally dissipate from soil, because there is a natural content of fatty acids in soil resulting from plant metabolism and by formation by microbial organisms. Fatty acids constitute a significant portion of the normal daily diet of mammals (including humans), birds, and invertebrates since they are found in large amounts in the form of lipids in all living tissues (including seeds). Potassium salts of fatty acids are naturally occurring. Microbial metabolism of fatty acids has the effect of either converting the degradates to CO₂ and ester (if used as an energy source) or converting the carbon content of the fatty acid to any of the thousands of naturally occurring organic substances produced by the soil microflora (if used as a carbon source).

2. Ecological Hazard Assessment for Ammonium Salts of Fatty Acids

Topical summaries addressing each data requirement:

(i.) Effects on Birds

Three studies were submitted by Uniroyal Chemical Company Inc. to determine the effect of ammonium salts of fatty acid on birds. The three studies were determined to be supplemental because test material used in the study was reported to be only 14.65 percent pure.

Author	<u>Date</u>	MRID No.
Pederson	1991	41767112
Pederson	1991	41767113
Pederson	1991	41767114

To establish the toxicity of ammonium of fatty acids to birds, the following tests are required using the technical grade material (TGAI).

- A. One avian single-dose oral study on either a waterfowl species (mallard duck) or an upland species (bobwhite quail).
- B. Two subacute dietary studies: one study on a species of upland game bird(bobwhite quail) and one study on a waterfowl species (mallard duck).

Studies submitted included:

Study and Species	% A.I.	LD/LC50	Date	MRID	Fulfills Requirement
71-1 Avian Oral- Bobwhite Quail	14.65	2,150 ppm	1/91	41767112	Y
71-2 Bobwhite Quail-	14.65	5,000 ppm	1/91	41767113	Y
Mallard Duck	14.65	5,000 ppm	1/91	41767114	Y

Although these avian studies are classified as supplemental (the active ingredient was determined to be only 14.65 % pure) data could be used to satisfy the data requirement. The oral LD50 was determined to be 2,150 ppm for mature bobwhite quail given a single oral dose of ammonium salts of fatty acids (Pederson, 1991, MRID 41767112). The results of 8-day dietary studies (Pederson, 1991, MRID's 41767113 and 41767114) indicate that the LC50 for ammonium soap salts is greater than 5,000 ppm for both mallard ducks and bobwhite quail. The available data indicate that ammonium salts of fatty acids is practically non-toxic to upland game birds and waterfowl.

Precautionary Labeling

The available toxicity data do not indicate a requirement of precautionary labeling for birds on products containing Ammonium salts of fatty acids.

(ii.) Effects on Freshwater Invertebrates

No studies were received on ammonium salts of fatty acids for freshwater invertebrates. Minimum data requirement to establish the acute toxicity of ammonium salts of fatty acids to freshwater invertebrates includes:

A. A 48-hour acute study using the technical grade material. Test organisms should be first installed <u>Daphnia magna</u>.

Data for aquatic invertebrates used in the hazard assessment were derived from tests conducted on Potassium Salts of Fatty Acids. Science staff determined that the chemical properties for all soap salts were very similar. Although this does not necessarily mean the biological effects are similar, the Ecological Effects Branch has tentatively concluded that the worst case scenario for Ammonium Salts of Fatty Acids is not likely to be significantly different than Potassium Salts of Fatty Acids. The core study for Potassium soap salts indicates that potassium soap salts are highly toxic ($LC_{50} = 0.57$ ppm) to freshwater invertebrates (MRID 400662-00).

Precautionary Labeling

This product may be hazardous to aquatic invertebrates. Do not apply directly to water, areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of water.

(iii.) Effects on Freshwater Fish

The minimum data required for establishing the acute toxicity of ammonium salts of fatty acids to freshwater fish are two 96-hour freshwater fish studies with the technical grade active ingredient. The following studies are required:

- A. One 96-hour study with a coldwater fish species (preferable rainbow trout)
- B. One 96-hour study performed with a warmwater fish species (preferably bluegill sunfish).

No studies using ammonium salts of fatty acids were submitted under this topic; however, a tentative position can be taken that because of the similarities of soap salts, the potassium salts of fatty acid data can probably be substituted for ammonium salts of fatty acids.

Two tests were performed on freshwater fish using the potassium salt technical grade material. The LC50's were determined to be 18.06 ppm and 35.35 ppm for trout and bluegill respectively. One study with the typical end-use product performed on fathead minnows produced a LC50 of 21 ppm. These data indicate that potassium soap salts, and by presumption, ammonium soap salts are slightly toxic to both coldwater and warmwater fish species.

Precautionary Labeling

The available acute toxicity data indicate that precautionary labeling for fish toxicity is not required.

(iv.) Effects on Non-Target Insects

No studies were received on the effects of ammonium salts of fatty acids on non-target insects.

Precautionary Labeling

Precautionary labeling will be required if data to be submitted indicates a significant risk.

3. Ecological Hazards Assessment for Potassium Salts of Fatty Acids

Topical summaries addressing each data requirement:

(i.) Effects on Birds

Seventeen studies were submitted from 2 different companies to determine the effect of potassium salts of fatty acid (soap salts) on birds. Seven of the 17 studies submitted were acceptable for use in the risk assessment. Ten of the studies can be used to supplement the core data used in the risk assessment.

Author	<u>Date</u>	MRID No.
Grimes	1987	94240004 (TGAI)
Grimes	1987	94240004 (TEP)
Grimes	1987	94240005 (TGAI)
Grimes	1987	94240005 (TEP)
Grimes	1987	94240005
Wildlife Int. Ltd.	1981	00096639A
Wildlife Int. Ltd.	1981	00096639B
Wildlife Int. Ltd.	1981	.00157472
Wildlife Int. Ltd.	1981	00010504 (2 studies)

To establish the toxicity of potassium salts of fatty acids to birds, the following tests are required using the technical grade material (TGAI).

- A. One avian single-dose oral study on either a waterfowl species (preferably mallard duck) or an upland species (preferably bobwhite quail).
- B. Two subacute dietary studies: one study on a species of upland game bird (preferably bobwhite quail and one study on a species of waterfowl (preferably mallard duck).

The acceptable acute oral toxicity studies are listed below:

Data Requirements	Test Substance	Bibliographic Citation	Validation	Company	Results
AVIAN TESTING					
71-1 Aviso Oral		•			
Bobwhite	TEP	94240004	Supplemental	Reuter	LD50= >2,250 mg/kg
	TGAI	94240004	Core	Reuter	LD50= >2,000 mg/kg
Mallard Duck	TGAI	00096639В	Supplemental	Safer	LD\$0= >2,510 mg/kg
	TGAI	00096639A	Supplemental	Safer	1.D50 = >2.510 mg/kg

The acceptable subacute dietary toxicity studies are listed below:

Date Requirements	Test Substance	Bibliographic Citation	Validation	Company	Results
71-2 Avian Dietary					
Bobwhite	TGAI	00098640	Core	Safer	LC50 = >5,620 ppm
	TGAI	00010504	Core	Safer	LC50 = >5,620 ppm
	TGAI	00010504	Supplemental	Safer	LC50 = > 10,000 ppm
	TEP	942400-05	Supplemental	Reuter	LC50 = >5,620 ppm
·	TGAI	942400-05	Core	Reuter	LC50 = >5,620 ppm
Mallard Duck	TGAI	942400-05	Core	Reuter	LC50 = >5.620 ppm
	TEP	942400-05	Supplemental	Reuter	LC50 = >5,620 ppm

An LD50 greater than 2,000 mg/kg was determined for bobwhite quail given a single oral dose of soap salts (Reuter Company, 1987 MRID 94240004). Also a LD50 greater 2,510 mg/kg was determined for mallard ducks (Safer, 81992, MRID 00096639). Therefore, soap salts can be considered relatively non-toxic to bobwhite quail and mallard duck on an acute oral basis.

Results from the 8-day Subacute Dietary LC50 for mallard ducks and bobwhite quail were determined to be greater than 5,620 ppm (Safer Company, 1992, MRID 00096640 and Reuter Company, 1987, MRID 94240005). These data indicate that soap salts are practically non-toxic to bobwhite quail and mallard ducks on a dietary basis.

Precautionary Labeling

The available toxicity data indicates that precautionary labeling for birds on products containing potassium salts of fatty acids is not required.

(ii) Effects on Freshwater Invertebrates

Three studies were received and evaluated under this topic. All studies were found acceptable for use in a hazard assessment. However, two of the studies were considered supplemental in nature because the typical end use product was used in the studies (50% A.I.). The studies are listed below:

Author	Date	MRID No.
Condrashoff	1979	00030865
Condrashoff	1979	00096638
Harrison	1986	40066200

To establish the acute toxicity of potassium salts of fatty acids to aquatic invertebrates, the following test is required using technical grade material (TGAI).

A. A 48-hour acute study using the technical grade material. Test organisms should be first instal <u>Daphnia magna</u>.

The studies acceptable for use in the hazard assessment are listed below:

Data Requirements	Test Substance	Bibliographic Citation	Validation	Company	Results
					
AQUATIC TESTING					
72-2					
Daphnia	TGAI	00030865	Supplemental	Safer	LC50 = 102 ppm
Dephnia	TGAI	00096638	Supplemental	Safer	LC50 = 102 ppm
Daphnia	TGAI	400562-00	Core	Router	LC50 = .57 ppm

A 48-hour LC50 of 0.57 ppm was found for Daphnia magna exposed to technical potassium salts of fatty acids (Reuter Company, 1987 MRID 40066200). The results of this study indicate that potassium salts of fatty acids are highly toxic to aquatic invertebrates. The results of this study triggers a <u>Daphnia</u> life-cycle study. However, this study will not be needed to assess the effect of potassium salts of fatty acids on aquatic invertebrates, since due to the expected fate of the material, significant concentrations of the pesticide are not expected to occur in aquatic environments.

Precautionary Labeling

This product may be hazardous to aquatic invertebrates. Do not apply directly to water, areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of water.

(iii.) Effects of Freshwater Fish

Five studies were evaluated under this topic. All five studies were considered acceptable for use in a hazard assessment.

Author	<u>Date</u>	MRID No.	
Analytical BioChem.Lab.	1985	00157473	
Applied Bio. Science Lab.	1981	00096637	
Applied Bio. Science Lab.	1981	00096636	
Obenchain	1986	40066200 (2 studie	s)

The minimum data required for establishing the acute toxicity of soap salts to freshwater fish are two 96-hour studies with the technical grade product both coldwater and warmwater species of fish. The preferred coldwater species is rainbow trout and the preferred warmwater species is bluegill sunfish).

The acceptable acute toxicity data are listed below:

Data Requirements	Test Substance	Bibliographic Citation	Validation	Company	Results
					
AOUATIC TESTING					
72-1 Freshweter Fish					
Trout	TGAL	00096636	Supplemental	Safer	LC50= 18.06 ppm
Fathead Minnow	TEP	00096637	Supplemental	Safer	LC50= 21 ppm
Bluegill Sunfish	TGAI	157473	Core	Safer	LC50= 35.35 ppm
Bluegill Sunfish	TGAI	400662	Supplemental	Reuter	LC50= 23 ppm
Trout	TGAI	4006200	Supplemental	Reuter	LCS0= 9.19 ppm

Two tests were performed on freshwater fish using the technical grade material. The LC50's were determined to be 18.06 pm and 35.35 ppm for trout and bluegill respectively. One study with the typical end-use product performed on fathead minnows produced a LC50 of 21 ppm. These data indicate that soap salts are slightly toxic to both coldwater and warmwater fish species.

Precautionary Labeling

The available acute toxicity data indicate that precautionary labeling for fish toxicity is not required.

(iv.) Effects on Non-Target Insects

No studies were received on the effects of soap salts on non-target insects. To establish the toxicity of soap salts to honey bees, a Honey Bee Acute Contact LD50 test. This test is required because the use patterns and target crops of soap salt correspond with the locations and use patterns that may effect pollinators.

4. Environmental Risk Assessment of Potassium and Ammonium Salts of Fatty Acids

As presented above and in Appendix A, pesticide products containing potassium or ammonium salts of fatty acids are registered for use on a wide array of field, fruit and vegetable crops and ornamental turf and plants, as well as a few other uses. The active ingredients applied to these sites are expected to be degrade rapidly, perhaps a half-life of less then one day. Microbial degradation is the primary path of this rapid degradation. Therefore, the Agency believes that these chemicals, when used as directed, will not persist in the environment.

Data reviewed suggest that neither potassium or ammonium salts of fatty acid are very toxic to upland avian species or waterfowl by either acute or dietary exposure. Therefore, the Agency believes the potential risks to avian species is minimal.

For aquatic species, the Agency believes the available data on potassium salts of fatty acid suggest this active ingredient, and probably ammonium salts of fatty acids, are only slightly toxic to both warmwater and coldwater fish species. However, for aquatic invertebrates, these chemicals are considered highly toxic. The Agency believes, though, that the current uses should not result in serious impact to aquatic invertebrates because these pesticides are not applied directly to water and undergo very rapid microbial degradation in soil.

No studies were received on the effects of soap salts on non-target insects. To establish the toxicity of soap salts to honey bees, the Agency is requiring a Honey Bee Acute Contact LD50 test. This test is required because the use pattern and target crops of soap salts correspond with the locations and use patterns that may effect pollinators. Based upon the

available data, ammonium and potassium salts of fatty acids should pose minimal threats to endangered species. This conclusion is tentative pending submission of maximum application use rates for certain uses.

IV. RISK MANAGEMENT AND REREGISTRATION DECISION FOR SOAP SALTS

A. Determination of Eligibility

Section 4(g)(2)(A) of FIFRA requires the Agency to determine, after consideration of relevant data of an active ingredient whether products containing the active ingredient are eligible for reregistration. The Agency has considered available data and other factors including soap salts's natural occurrence, its common use as food items, and the lack of reported adverse effects information. The Agency has completed its consideration of these data and other factors and has determined this information is sufficient to support reregistration of products containing soap salts as an active ingredient. The reregistration of particular products is addressed in Section V of this document.

Although the Agency has concluded that products containing soap salts are eligible for reregistration, the Agency may take regulatory actions in the future that would affect the continued registration of soap salts-containing products if significant new information about these active ingredients and/or their products comes to the Agency's attention. Such regulatory action could include requiring the submission of additional data if the data requirements for registration (or the guidelines for generating such data) change.

B. Additional Generic Data Requirements

The generic data base supporting the reregistration of products containing soap salts has been reviewed and determined to be substantially complete for reregistration. However, the Agency is requiring acute ecotoxicity studies on fish and aquatic invertebrates for ammonium salts of fatty acids and an acute toxicity study on honey bees for the potassium salt to confirm its opinion that the potential ecological hazards from these pesticides are not greater than suggested by the currently available data. See Appendix F for details.

C. Labeling Requirements For Manufacturing-Use Products Of Soap Salts

No manufacturing-use products are registered.

V. ACTIONS REQUIRED BY REGISTRANTS OF END-USE PRODUCTS

A. Determination Of Eligibility

Based on the reviews of the generic data for the active ingredients, the products containing potassium or ammonium salts of fatty acids are eligible for reregistration. As mentioned above, the Agency is requiring certain ecotoxicology studies to confirm its risk assessment. These must be conducted and submitted in conformance with specifications in Appendix F. Section 4(g)(2)(B) of FIFRA calls for the Agency to obtain any needed product-specific data regarding the pesticide after a determination of eligibility has been made. The Agency will review these data when they have been submitted and/or cited and determine whether to reregister individual products.

1. Product Specific Data Requirements

The Agency is requiring certain product chemistry and acute toxicology studies for end-use products. The specific data requirements are stated in Attachment C.

2. Labeling Requirements For End-Use Products

- a. The labels and labeling of all products must comply with the Agency's current regulations and requirements. Follow the instructions in the Product Reregistration Handbook with respect to labels and labeling.
- b. The following statement must appear under the title Environmental Hazards on the product labels marketed for outdoor use.

"This product may be hazardous to aquatic invertebrates. Do not apply directly to water, areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment, or disposal of water."

c. The active ingredient statement must identify the type of soap salts and not just list "soap." Therefore, the active ingredient statement must read "ammonium salts of fatty acid" or "potassium salts of fatty acids."

- d. For products containing ammoniated soaps, safety glasses, or a face shield must be required under the Precautionary Statements.
- e. Under the Directions for use, the statement "including but not limited to" for food/feed uses must be removed and all crops or crop groupings must be listed.

APPENDIX A

Soap Salts Use Patterns Subject to Reregistration

September 14, 1992

APPENDIX A. Case 4083, [Soap Salts] Chemical 031801	4083, [Soap Satts] Chemical	031801	[Ammo	[Ammonium Salts of Fatty Acids]	ls of Fal	tty Act	ds)	
SITE Application Type, Application Timbrg, Application Equipment	Form	Minimum Application Rate	Maximum Application Rele	Мен. Ф Аррз.	Max & Apps. @ Max Pale	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	un Osc	Geographic Limitations	Use Umitations also see Abbreviations
					,	(Days)	(Deys)	Allowed	Disallowed	
USES ELIGIBLE FOR REPEGISTRATION										
FOOD/FEED USES										
Grass Forage/Fodder/Nay Use Groups: Terrestrial Feed	pa		•							
Perimeter, when needed, Hand held Sprayer	sch	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Grass Forage/Fodder/Nay Use Groups: Terrestrial Feed	þe									
Perimoter, when needed, Power Sprayer	SCA.	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Nongrass Forage/Fodder/Straw/Hay Use Groups: Terrestrial Feed	rrestrial Feed									
Perimeter, when needed, Power Sprayer	SCA	Not specified	5 Gal	Nat specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Nongrass Forege/Fodder/Straw/Hay Use Groups: Terrestrial Feed	rrestrial Feed									
Perimeter, when needed, Power Sprayer	SCA	Not specified	5 Gad	Not specified	Not	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Cereal Grains Use Groups: Terrestrial Food-Feed			,			!				
Perimotor, when needed, Hand held Sprayer	SCA	Not specified	5 Ged	Not specified	Not specified	Not specified	Not specified	special be	Not specified	Not specified
Cereal Grains Use Groups: Terrestrial Food-Feed										
Perimeter, when needed, Power Sprayer	SCA	Not specified	5 Gad	Nat specified	Not specified	Not specified	Not specified	Not specified	Not	Not specified
Field Crops Use Groups: Terrestrial Food-Feed										
Spray, when needed, Aircraft	SCAL	Not specified	5 Gel	Not specified	Not specified	Not specified	Not specified	Specific sections	Not specified	Not specified
							•		•	

Spray, when needed, Hose-and Sprayer Spray, when needed, Aircraft Spray, when needed, Hose-Broups: Terrestrial Food-Feed Spray, when needed, Aircraft Spray, when needed, Hose-and Sprayer Spray, when needed, Hose-and Sprayer	Max. 6 Apps. 69 Max. Rate	nium Sa	(Ammonium Salts of Fatty Acids)	tty Aci	[sp	
SC/L Not specified 4 Gal SC/L Not specified 4 Gal SC/L Not specified 1:1 SC/L Not specified 5 Gal SC/L Not specified 5.33 fl oz.	_	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	3 5	Geographic Limitations	Use Limitations also see Abbreviations
SC/L Not specified 4 Gal SC/L Not specified 4 Gal SC/L Not specified 1:1 SC/L Not specified 5 Gal SC/L Not specified 5.33 fl oz.		(Days)	(Days)	Allowed	Disultowed	
SC/L Not specified 4 Gal SC/L Not specified 1:1 SC/L Not specified 5 Gal SC/L Not specified 5.33 fl oz.						
SC/L Not specified 4 Gal SC/L Not specified 5 Gal SC/L Not specified 5 Gal SC/L Not specified 5.33 fl oz.	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
SC/L Not specified 1:1 SC/L Not specified 5 Gel SC/L Not specified 5.33 floz.						
SC/L Not specified 1:1 SC/L Not specified 5 Gel SC/L Not specified 5.33 fl oz.	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
SC/L Not specified 1:1 SC/L Not specified 5 Gel SC/L Not specified 5:33 fl oz.						
SC/L Not specified 5 Gel SC/L Not specified 5.33 fl oz.	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
SC/L Not specified 5 Gel SC/L Not specified 5.33 ff oz.						
SC/L Not specified 5.33 fl oz.	Not specified	Noi specified	Not specified	Not specifi ed	Not specified	Not specified
SC/L Not specified 5.33 fl oz.						
da (Ihspecified) Use Groups: Terrestrial Food+Feed	Not specified	4	Not specified	Not specifi ed	Not specified	Not specified
Spray, when needed, Hand held Sprayer SC/L Not specified 5 Gal Not specified specified	Not	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Fruits (Unspectified) Use Groups: Terrestrial Food+Feed						
Spray, when needed, Power Sprayer SC/L Not specified 5 Gal Not specified	Not specified	1	Not specified	Not specifi ed	Not specified	Not specified

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SIE Application Type, Application Timing, Application Fruits (Unspecified) Use Groups: Terrestrial Food+Feed Spray, when needed, Tank Sprayer Scrit. Not specified Bark treatment, when needed, Brush Orchards (Unspecified) Use Groups: Terrestrial Food+Feed Bark treatment, when needed, Brush Scrit. Not specified Orchards (Unspecified) Use Groups: Terrestrial Food+Feed Spriny, when needed, Aircraft Spriny, when needed, Aircraft Spriny, when needed, Aircraft	Application Rate Application Rate S.33 il oz. sp. 1:1 sp. 5 Gal sp.	Not Specified Sp	Not Specified Not Specified Not	Min. Interval Between Apps. @ Max. Rate (Days) 7 7 Not	Restricted Entry Interval (Days)	8 5	Grow aptic Limitations	Use Umitations also see Abbreviations
/L Not specified /L Not specified /L Not specified		 	Not specified Not	(Days) 7 Not specified	(Deys)			
/L Not specified /L Not specified /L Not specified		 	Not Not Specified Not	Not specified		Panony	Disallowed	
A Not specified A Not specified A Not specified		 	Not Specified Specified Not Not	Not specified				
4 4		│ ├──┤ ├──┤	Not specified Not	Not specified	Not specified	Not specifi ed	Not specified	Not specified
		┝╼╌┤┝┈╾┤	Not Specified Not	Not specified		i		
2		├──	No.		Not specified	Not specifi ed	Not specified	Not specified
٠.			No.					
			specified	7	Noi specified	Not specifi ed	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed								
/L Not specified	5.33 fl oz. sp	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed								
Spray, when needed, Hand held Sprayer SCA. Not specified	S Gall	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Feed+Feed								
Spray, when needed, Power Sprayer SC/L Not specified	5 Gad sp	Not sbecified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed								
L Not specified	5.33 fl oz. sp	Not specified s	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified

Site Application Type, Application Timing, Application Figuipment Figuipment Vegetables (Unspecified) Use Groups: Terrestrial Food+Feed Spriny, when needed, Aircraft Spriny, when needed, Hand held Sprinyer Spriny, when needed, Hand held Sprinyer Spriny, when needed, Hand held Sprinyer Spriny, when needed, Power Sprinyer				Man. Interval Between Apps. @ Max. Rate (Days) 7 7 Not specified	Restricted Entry Interval	<u> </u>	Geographic Limitations	At - I imilation
Not specified Not specified Not specified		╼╉┝══┥┝╼═┥	─ ┃ ├──	7 Noi hedibed	(Days)	Š		Use Umitations also see Abbreviations
Not specified Not specified Not specified			I ├───┤├─	Noi Pegiped	1	Allowed	Otsallowed	
Not specified Not specified Not specified				Not Specified				
Not specified Not specified Not specified		 	├	Not pecified	Not specified	. Not specifi ed	Not specified	Not specified
Not specified Not specified Not specified			——	Not pecified				
Not specified Not specified		l	-		Not specified	Not specifi ed	Not specified	Not specified
Not specified Not specified			7					
Not specified			specified	7	Not specified	Not specifi ed	Not specified	Not specified
Not specified								
	4 Gel N	Not No specified spec	Not specified	7.	Not specified	Not specified	Not specified	Not specified
Venetables (Unspecified) Use Groups: Terrestrial Feed-Feed								
Not specified	5.33 ff oz. 8pec	Not . Not spec	Not specified	Not specified	Not specified	Specific be	Not specified	Not specified
Crossmental Herbaceous Plants Use Groups: Terrestriel Non-Food								
Not specified	5 Ged Rpex	Not Not spec	Not specified	Not specified	Not specified	Specific be	Not	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food								
SC/L Not specified	5 Gel spec	Not Not Spec	Not specified	1	Not specified	Not specified	Not specified	Not specified

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APPENDIX A. Cat	Case 4083, [Soap	_	Salts] Chemical 031801	031801	[Ammo	[Ammonium Salts of Fatty Acids]	its of Fa	ity Acid	dsj	
SITE Application type, Application Timing, Application Equipment	Form	Minimum Application Rate	Madmum Application Rate	Max. • Apps.	Max. # Apps. (# Max. Rate	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	₩∏ Dago	Geographic Limitations	Use Limitations also see Abbreviations
						(Days)	(Deys)	Allowed	Disallowed	
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food	striel Non-Foo	P								
Spray, Nurserystock, Hose and Sprayer	SCA	Not specified	5.33 fl oz.	Noi specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food	striel Non-Foo	ļ								
Spray, Nurserystock, Hand held Sprayer	SCAL	Not specified	4 Gal	Not specified	Not specified	Not	Not specified	Not specifi ed	Not specified	Not specified
Omemental Herbaceous Plants Use Groups: Terrestrial Non-Food	stried Non-Foo									
Spray, when needed, Hand hald Sprayer	SCAL	Not specified	4 Gal	Not specified	Noi Specified	2	Not specified	Not specifi ed	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Torrestrial Non-Food	striet Non-Foo	10								
Spray, Nurserystock, Power Sprayer	SCA	Not specified	4 Gal	Not specified	Not specified	Not specified	Noi specified	Not specifi ed	Not specified	Not specified
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food	Striet Non-Foo	P								
Spray, Mursarystock, Tank-type Sprayer	SCAL	Not specified	4 Gal	Not specified	Noi specified	2	Not specified	Not specifi ed	Not specified	Not specified
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential	striel Non-Foo	d+Outdoor Resid	ential							
Spray, when needed, Hose-end Sprayer	SCAL	Not specified	5.33 fl oz.	Not specified	Not specified	2	Not specified	Not specifi ed	Not specified	Not specified
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential	stried Non-Foo	d+Outdoor Resid	ential							
Spray, when needed, Power Sprayer	SCA	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not	Not specified	Not specified

		Case week semal comment on the								
SITE Application Type, Application Tinting, Application Equipment	Form	Minimum Application Rate	Maximum Application Rate	Max. # Apps.	Max. # Apps. @ Max. Rate	Min. Interval Between Apps. & Max. Rate	Restricted Entry Interval	ទីក	Geographic Umitetions	Use Limitations also see Abbreviations
						(Days)	(Days)	Allowed	Disalowed	
Omamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential	strial Non-Foo	d+Outdoor Resid	ential							
Spray, when needed, Hand held Sprayer	SCAL	Not specified	5.33 # 02.	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omamental Herbacacus Plants Use Groups: Outdoor Residential	oor Residentia									
Spray, when needed, Power Sprayer	SCAL	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omamental Lawns and Turf Use Groups: Terrestrial Non-Food-Outdoor Residential	Non-Food+C	Nuldoor Resident	.5							
Spray, when needed, Power Sprayer	SCA	Not specified	5 -	Not specified	Not specified	Not specified	Not specified	Noi specifi ed	Not specified	Not specified
Omamental Lawns and Turf Use Groups: Terres	striat Non-Foor	Terrestrial Non-Food Dutdoor Residential	entias							
	SCAL	Not specified	1 qt	Not specified	Not specified	4	Not specified	Not specifi ed	Not specified	Not specified
Omamental Lawns and Turf Use Groups: Terrestrial Non-Food+Outdoor Residential	el Non-Food+(Dutdoor Resident	į							
Spray, when needed, Tank-type Sprayer	SCA	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-F	. Terrestrial N	on-Food								
Bark treatment, Nurserystock, Brush	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omamental Wood Shrubs and Vines Use Groups: Terrestrial Non-Food	Terrestrial No	n-Food								
Bark treatment, when needed, Brush	SCA	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified

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APPENDIX A. Case	4083, [Case 4083, [Soap Salts]	Chemical 031801	031801	[Ammo	(Ammonium Salts of Fatty	ts of Fa	ity Acids]	ds]	
SITE Application Type, Application Timing, Application Equipment	Form .	Minimum Application Rate	Maximum Application Rate	Max. #	Max, e Apps, @ Max, Rate	Min. Intervel Between Apps. @ Max. Rate	Restricted Entry Interval	רוש פיני	Geographic Limitations	Use Limitations also see Abbreviations
					•	(Days)	(Days)	Allowed	Oksallowed	
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-	nestrial No	n-Food								
Spray, Nurserystock, Aircraft	SCA	Not specified	5 Ged	Not specified	Noi	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food	restrial No	n-Food								
Spray, when needed, Aircraft	sc∕t.	Not specified	5 Gal	Not specified	Not specified	Not specified	Not	Not specifi ed	Not specified	Not specified
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food	restrial No	n-Food								
Spray, Nurserystock, Hose-end Sprayer	SCL	Not specified	5.33 fl oz.	Not specified	Noi specified	Not specified	Not specified	Noi specifi ed	Not specified	Not specified
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food	rrestrial No	n-Food								
Spray, Nurserystock, Hand held Sprayer	sc/L	Not specified	4 Gal	Not specified	Policed	4	Noi specified	Not specifi ed	Not specified	Not specified
Omemental Woody Shrubs and Vines Use Groups: Terrestrial Non-	rrestrial No	n-Food								
Spray, when needed, Hand held Sprayer	sc/t	Not specified	4 Gel	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food	restried No	h-Food								
Spray, Nursarystock, Power Sprayer	sc/L	Not specified	4 Gal	. Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food	rrestrial No	n-Food								
Spray, Foller, Pump Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	~	Not specified	Not specifi ed	Not specified	Not specified

APPENDIX A. Case	4083,	Soap Salts	Case 4083, [Soap Salts] Chemical 031801	031801	[Ammo	[Ammonium Salts of Fatty Acids]	ts of Fal	ity Aci	ds)	
	Form	Minimum Application Rate	Maidmum Application Rate	Мах. « Афръ.	Max. # Apps. @ Max. Rete	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	an S	Geographic Limitations	Use Limitations also see Abbreviations
						(Days)	(Days)	Allowed	Disullowed	
Omamental Woody Shrubs and Vines Use Groups: Terrestrial Non-F	Terrestriel No	n-Food+Outdoor Residential	Residential							
Bark treatment, when needed, Brush	SCA	Not specified	5,33 # oz.	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omemental Woody Shrubs and Vines Use Groups: Terrestrial Non-F	Terrestrial No	n-Food+Outdoor Residential	. Residential							
Spray, when needed, Hose-end Sprayer	SCA	Not specified	<u>.</u>	Not	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omenmental Woods Shints and Vines, Use Groups: Terrestrial Non-	Terrestrial No	n-Food+Outdoor Residential	r Residential							
Spray, when needed, Power Sprayer	SCAL	Not specified	5.33 fl oz.	Not	Not specified	2	Not specified	Noi specifi ed	Not specified	Not specified
Omammital Woody Shrubs and Vines Use Groups: Terrestrial Non-f	Terrestrial No	n-Food+Outdoor Residential	r Residential						•	
Spray, when needed, Tank-type Sprayer	SCA	Not specified	5.33 fl oz.	Not specified	Not specified	1	Not specified	specifi ed	Not specified	Not specified
Community Woods Shrubs and Vines Use Groups: Outdoor Residential	Outdoor Res	idential								
Bark treatment, when needed, Brush	SCA	Not specified	Ħ	Not specified	Not specified	1	Not specified	Noi specifi ed	Not specified	Not specified
Omamental Woody Shrubs and Vines Use Groups: Outdoor Residential	Outdoor Res	Idential								
Spray, when needed, Hand held Sprayer	SCA	Not specified	B	Not specified	pagyoads Not	1	Not specified	Not specified	Not specified	Not specified
Commental Woody Strubs and Vines Use Groups: Outdoor Residential	Outdoor Res	idential								
Spray, when needed, Power Sprayer	SCA	Not specified	# -	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
			·							

APPENDIX A. Case 4083, [S	4083,	Soap Salts	coap Salts] Chemical 031801	031801	[Ammo	[Ammonium Salts of Fatty Acids]	ts of Fa	tty Aci	[sp	ı.
SITE Application Type, Application Timing, Application Equipment	Form	Minimum Application Rate	Maximum Application Rate	Mail. # Apps.	Max. # Apps. @ Max. Rate	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	85	Geographic Umitations	Use Umitations also see Abbreviations
						(Deys)	(Deys)	Allowed	Disallowed	
Omemental and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Foo	R								
Bark treatment, Nurserystock, Brush	SCAL	Not specified	1:1	Not specified	Nat specified	Not specified	Not specified	. Not specifi ed	Not specified	Not specified
Omemental and/or Shade Trees Use Groups: Terrestrial Non-Food	tried Non-Fox	7								
Bark treatment, when needed, Brush	SCA	Not specified	131	Noi	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omemontal and/or Shade Trees Use Groups: Terrestrial Non-Food	triel Non-Foo	R								
Spray, Nursenystock, Aircraft	SCAL	Not specified	5 Gal	Not specified	Not	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omamonial and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Fox	8					,			:
Sprny, when needed, Aircraft	SCAL	Not specified	5 Gel	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omemental and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Foo	2				i				
Spray, Nursenystock, Hose-end Sprayer	SCA	Not specified	5.33 fl oz.	Not specified	Not	Not specified	Not specified	Nat specified	Not specified	Not specified
Omamental and/or Shade Trees Use Groups: Terrestrial Non-Food	triel Non-Foo	8								,
Spray, Nursenyelock, Hand held Sprayer	sc/L	Not specified	4 Gal	Not	Not	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Foo	×								
Spray, when needed, Hand held Sprayer	SCA	Not specified	4 Gel	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
	·									

APPENDIX A. Case 4083, [Soap Salts] Chemical 031801	e 4083, [Soap Salts] Chemical	031801	[Ammo	[Ammonium Salts of Fatty Acids]	ls of Fat	ity Ack	İsj	
SITE Application Type, Application Timing, Application Equipment	Form	Minimum Application Rate	Maximum Application Rate	Max. # Apps.	Max. # Apps. # Max. Rate	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	Gec	Geographic Limitations	Use Umitations also see Abbreviations
						(Days)	(Days)	Allowed	Disallowed	
Omemental and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Foc	X								
Spray, when needed, Power Sprayer	SC/L	Not specified	4 Gai	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omemental and/or Shade Trees Use Groups: Terrestrial Non-Food	trial Non-Foo	2								
Spray, Nurserystock, Tank-type Sprayer	SCAL	Not specified	4 Gal	Not specified	Not	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Omamontal and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential	trial Non-Foc	xd+Outdoor Resi	dential							
Bark Treatment, when needed, Brush	SC/L	Not specified	1:1	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornammental and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential	estrial Non-F	ood+Outdoor Re	sidential							
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5,33 fl oz.	Not specified	Not	7	Not	Not specified	Not specified	Not specified
Omernanial and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential	trial Non-Foo	xd+Outdoor Resi	dentied							
Spray, when needed, Power Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Specific of the second	Not specified	Not specified
Omamental and/or Shade Trees Use Groups: Terrestrial Non-Food	triel Non-Foo	od+Outdoor Residential	dential							
Spray, when needed, Tank-type Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omamental and/or Shade Trees Use Groups: Outdoor Residential	or Residenti	3								
Bark treatment, when needed, Brush	SCAL	Not specified	131	Not specified	Noi specified	7	Not specified	Not specified	Not specified	Not specified
			ç							

APPENDIX A. Case 4083, [Soap Salts] Chemical 031801	e 4083,	Soap Salts) Chemical	031801	[Ammo	[Ammonium Salts of Fatty Acids]	ts of Fa	tty Aci	ds]	
Site Application Type, Application Timing, Application Equipment	Form	Minimum Application Flate	Meximum Application Rate	Max. • Apps.	Mex. # Apps. @ Mex. Rate	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	ลัก อั	Geographic Umitations	Use Limitations also see Abbreviations
						(Days)	(Days)	Allowed	Disallowed	
Omamental and/or Shade Use Groups: Outdoor Residential	sidential									
Spray, when needed, Hand held Sprayer	SCAL	Not specified	1 व्रा	Not specified	Not specified	7	Not specified	Not specifi ed	Not specified	Not specified
Omamental and/or Shade Trees Use Groups: Outdoor Residential	or Residenti									
Spray, when needed, Power Sprayor	SCA	Not specified	фı	Not	Not specified	7	Not specified	Not specifi ed.	Not specified	Not specified
Household/Domestic Dwellings Outdoor Premises Use Groups: Outdoor Residential	e Groups: C	Autdoor Residenti	-							
Spray, when needed, Hand held Sprayer	SCA	Not specified	ற் (Not specified	Not	7	Not specified	Not specifi ed	Not specified	Not specified
Household/Domestic/Dwellings Outdoor Premises Use Groups: Outdoor Residential	e Groups: C	Jutdoor Residenti	-							
Spray, when needed, Power Sprayer	SCA	Not specified	i qi	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Nat specified	Not specified
Nonagricultural Uncultivated Areas/Soil Use Groups: Terrestrial Non-Food	Terrestrial N	on-Food								
Perimeter, when needled, Hand held	SCA	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specifi ed	Not specified	Not specified
Nonagricultural Uncultivated Areas/Solls Use Groups: Terrestrial Non-Food	. Terrestrial	Non-Food								
Perimeter, when needed, Power Sprayer	SCA	Not specified	5 Gel	Noi specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

Abbreviations used

max=maximum; min-minimum; apps=applications;not spec=not specified; na=not applicable
SCA.*Soluble Concentrate/Liquid; SC/S*Soluble Concentrate/Solid; FNI/S*Form Not identified/Solid; Cr=Crystalline
Al=active ingredient; A=acre; ppm=parts per million; Vol.=Volume Header: Form: Rate:

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September 16, 1992

APPENDIX A. CASC	4083, [Soap	Soap Salts	Chemical	079021	Potassium		Salts of Fa	Fatty Acids	-		
511t: Application Type, Application Timing, Application Equipment	ė eems	Maximum Application Rate	Minimum Application Ret	Max #	Man & Appe. 49 Man Rose	Mes. Rac Mas. Rac	Min learnaí Brimonn Ages de Man Res	Restricted Fater Interval	(Key	l ierugeaphis I emelaterin	Use Umissions also not Althrevialism
		_					(l'hys)	(Phys)	Aikwod	Pastered	
USES ELIGIBLE FOR REREGISTRATION											
FOOD/FEED USES											
Alfata	Use Groups: 1	Terrestrial Feed									
Spray. Fuliar. Sprayer	SC/L	2.5 fl.oz. with I gal water	NS	NS	NS	NS	7 days	SN	٧ ٧	٧N	U days PHII
Alala	tiec Gemps: (Greenhouse Fred									
. Foliar, Sprayer	SC/L	2.5 fl oz. with I gal water	SN	SN	NS	N.S.	7 days	SS	¥ Z	۷ ۲	0 days PHI
Arichele	Use Groupe:	Terrestrial Fraud & Greenbruse	Greenbause Fand	p.		, 					
iuliat. Sprayer	SC/L	2 % (1 11% with 1 gal water	NS	NS	SN	S Z	7 days	NS	۷ Z	۲ ۲	O days PHII
Управления	Use Groups:	Terrestrial Ford									
ustharvest. Sprayer	אכיר	2.5 fl.oz. with I gal water	NS	SS	SZ	NS	7 days	SN -	4 2	4 2	o days PIII
Aspergue	Use Groups:	Terrestrial & Grocebuuse	bruse Frad								
ioliar, Sprayer	SC/L	2.5 ().oz. with I gal water	SN	NS	SNS.	S Z	7 days	SN	٧ ٧	4 2	11 days Pitt
Benefit	Vac Groupe:	Terretriel & Greenhause	brate Ford								
Spray, Foliar, Sprayer	SC/L	2.5 ft oz. with I gal water	NS	NS	SZ SZ	NS	7 days	SN S	۲ ۲	42	0 days PHI
Beans	Vac Grupps:	Terrestrial Fixed &	A Food								
y. Folier. Pung Sprayer	L.RTU	Unspecified	NS	NS	NS	NS	7 days	NS	٧	٧ ٢	O days PHI
Spray. Folier, Pung Sprayer	L RTU	24 fl. esz /108) 1 sq. fl	SS	ž	SZ	SN	2 days	SN	۲ ۲	¥Z	O days PHII
Bruccoli	Use Groups: 1	Terrestrial Found									
Folias, Puny Sprayer	I. R.T.U	Unspecified	SZ	S.	Ž.	SZ	7 days	SN	٧٧	4 Z	0 day, PHI
									i 		

APPENDIX A	Case 4083,	4083, [Soap Salts]	Chemical	079021	[Potassium		Safts of Fatty Acids)	atty Aci	d s)		
MIP Applyanen Iype, Application Timing, Application Equipment	· ·	Macumum Apphyticum Nat	Mumum Application Kat	Min. #	M A A A A A A A A A A A A A A A A A A A	Mar Kee	Men hazoval Between Agya et Maa Rate	Restricted Later Married	.j. 1	i ir og saphe I vetesatu np	Use I missione also sec Albervaticas
							(Physic	(P.ys)	Athend	Ihrailamed	
Brunch Spruts	Use Group	upe: Terrestrial Foud									
Spray. Foliar. Punt Sprayer	L.RTU	Unspecified	NS	NS	NS	NS	7 days	NS	42	٧٧	O days PHII
Cathage	Use Grups:	Terrestrial Found									
Spray, Foliar, Punt Sprayer	L.RTU	Unspecified	NS	SN	NS	NS	7 days	NS	NA	VN	O days PHII
Casificover	Use Gruepe:	Ţ									
Spreay. Fuliae, Punsp Sprayer	L.RTU	Unspecified	NS	SN	NS	SN	7 days	SN	٧٧	٧N	O days PIII
Citres Fruit	Use Graups:	Terrestrial Foud	A Feed								
Spiay. Foliat. Spiayer	SC/II.	2.5 fl oz. with	SN	SN	SN	SN	7 days	SN	۷ ۷	¥ Z	o days PHI
Spray. Postharven. Sprayer	SC/L	2.5 fl. oz. with I gal water	NS	NS	NS	SN	NS	SS	NA	٧×	O days PHI
Cuffee	Use Grups:	Terrestrial & Greenth	busse Fund								
Spray. Fedias. Sprayer	SC/L	2.5 (l. oz. with I gal water	NS	NS	NS	NS	7 days	NS	٧ ٧	۷	O days PHI
Cule Crip	Use Grups:	Terrestrial Faud									
Spray. Fuliar, Punp Sprayer	L.RTU	24 (1.02./100) 84 (1.	NS	NS	NS	Š	2 days	ž	۲ ۲	«	O days PHI
Cale Crip	Use Graps:	Terrestrial & Greenhune	throne Found							į	
Spray. Foliat. Sprayer	SC/L	2.5 fl.oz. with I gal water	NS	SN	SN .	SN	7 days	ž	۲ ۲	4 2	O days PIII
Cutten (Umpecified)	Use Gritige:	Terrestrial Fand	A Feed								
Spray. Fuliar, Sprayer	SC/L	2.5 fl oz. with I gal water	NS	SNS	NS	NS	7 days	SN	٧ ٧	¥ Z.	O days PIII
Spray. Fidier. Sprayer	SC/L	2 qt A with 3 gal water	NS	S	S	SN	7 days	S.	۲ ۲	ď Z	O days PHI
Cress, Water	Use Groupe:	5	thraine final								

APPENDIX A. Case	e 4083, [S	nap Satts	Chemical	079021	Potassium		Salts of Fatty Acids	illy Aci	ds.j		
	E	Macanera Applastics Nat	Mauman Application Rec	Mar. #	Age of the state o	Man Rec	Min Bacrus Remocs Appu & Miss Rate	Kratricuol Isate Interval	ur:j	Gerugs agen. Carrelative	(for I emetatura alan sec Abberviorium
							(Illupot	dhysi	Alkmed	Destared	
Spray, Fuliar, Sprayer	SC/L	2.5 fl.oz. with	SN	SS .	SN	SN	7 days	S.	۲ ۲	V.	O days PHI
Occumber	Use Groups:	Terrestrial Fund									
y, Fuliar. Pump Sprayer		Unspecified	SN	. SZ	NS	ž	7 days	SS	4	۲ ۲	O days PH1
Spray, Foliac. Pump Sprayer	L-RTU	24 fl.uz./100 sq. fl.	SN	. SN	NS	NS	2 days	SN	۲ ۲	۲ ۲	O days PHII
County Vestables	Use Green	: Terredoial &	Greenhouse Fund]			
Spray. Fuliar. Sprayer	SCAL	~	SN	NS	NS	SN	U days	S.	۷ ۲	4 Z	n days PHI
	De Grande] 🥞	F.								
	EC	5 f) ny, with 1	SS	SS	NS	NS.	S days:	SN	٧	4 Z	O days PHI
Surav Entire Purm Suraver	L.RTU	Unspecified	SZ	SN	NS	NS	5 days	NS	٧,	Y.	O days PH1
Spray. Finlier, Priwer Sprayer	EC	S (1. oz. with 1 gal water	SS	SN	SN	NS	S days	Š	٧ ٧	٧	0 days PHI
Printing Cont Take (Innerited)	Use Grupe:	Greenhouse Fund									
	EC	1 .2 A	SN	SN.	NS	SN	S days	NS.	ž	<u>۲</u>	0 days PHI
Spray. Fishar. Rower Sprayer	EC	\$ (1.0c. with 1 gal water	. SN	SZ	SZ	SS	S days	S.	₹ Z	۲ ۲	0 days Pitt
Femilian .	Use Graspe:	Terrestrial Faud									
Foliar, Pumo Sprayer	L.RTU	Unspecified	NS	SN	NS	SN	7 days	SN	ž	٧×	0 days PIII
Spray, Feliar, Pump Sprayer	L·RTU	24 fl. uz./100 ×q. fl.	NS	SN .	NS	Š	2 days	ž	<u>۲</u>	۲ ۲	O days PHII
	Use Groups:	Terrestrial & Greenkwee	thrue Ford			:					
	SCAL	2.5 fl nz. with	S. Z.	SZ.	NS S	SZ	O days	SN	ž	ž	U days PHII
						 -					

Marchine	APPENDIX A. Case		4083, [Soap Salts]	Chemical	079021	Potassium	- 1	Salts of Fatty Acids	illy Aci	<u>3</u>		
Vegetables Lie Groups: Terrestivial & Closed-mass Found Fight RS NS	Application Liquidates	Frem	Maximum Application Base	Meerran Applevates Net	Mo. #	Mes # Appa 62 Mes Res	***	Min Interval Between Appa & Max	Restricted Latin Interval	deray.	opher:	Ligaritations islam est Abbreviations
Fudier, Sprayer SCV1 2.5 ff or, with NS NS NS NS NS NS NA NA			:					ilbyn	(Chys)	Alkmed	1 hasthmed	
Figure Springer SCTL 2.5 ft or, with NS NS NS NS NS NS NA NA		•	Terretain & Green									
Fullati, Springer SC/L 2.5 ft occusion NS NS NS NS NS NS NS N	ayer	1	2.5 fl cz. with I gal water	1	SN	SN	NS	O days	NS	۲ ۲	۲	O days PHI
Fultat: Sprayer SCTL 2.5 ft tot. with NS NS NS NS NS NS NS N			Terretarial Food									
Fudiar, Hand held Sprayer EC St 10 vs with 1 NS NS NS St days NS NA NA NA NA Fudiar, Hand held Sprayer EC St 10 vs with 1 NS NS NS St days NS NA NA NA Fudiar, Hand held Sprayer EC St 0 vs with 1 NS NS NS NS St days NS NA NA NA NA NA NA NA	ayer	SC/L	2.5 ft oz with I gal water	SS	SN	NS	NS	O days	NS	۲ ۲	٧ ٧	O days PHI
Fulsar. Hand held Sprayer EC 5 til 1.0 with 1 NS NS <th>-</th> <th>S</th> <th>errethist Food</th> <th>Food</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th>	-	S	errethist Food	Food								
Fuliat. Puwer Sprayer EC \$10 tot with NS NS NS \$4 days NS NA NA NA NA NA NA NA	nd held Sprayer	D3	S flire with I	SE	SN	SN	SN	skep ş	NS	4 2	Y Z	O days PHI
Linguisticad) Use Groups: Greatburse Fund Fullar. When needed. Napaet. Sprayer EC \$1 (1, 0.2, with 1) and water. NS NS \$4 days NS NA	Spray, Fulsar, Power Sprayer	EC	f II or with I	NS	SS	SN.	NS	s days	ź	ď Z	۲ ۲	to days. PHI
Fublar. Power Sprayer EC \$ ft or. with 1 pulper NS NS NS NS 5 days NS NA NA Fublar. Power Sprayer EC \$ ft or. with 1 pulper EC \$ ft or. with 1 pulper NS NS NS NS NS NS NA	Finise (Democified)	1	recobuse					ļ				
Fular Rower Sprayer LETU 24 Luci 100 NS NS NS S days NS NA	Spray. Foliat. Hand held Sprayer	EC	S Il oz. with I	SN	SN	SN SN	NS	S days	SN S	۲ 2	Y Y	O days PHI
Figure Sprayer Spray. Fuhar, Power Sprayer	EC	5 fl. oz. with 1 gal water	NS	NS	NS	SS	5 days	S.	ž	۲ ۲	O days PIII	
Treatment, When needed, Riapaset Sprayer L.RTU 24 ft. et./100 NS NS NS NS NS NA	Green		crreative Fund									
treatment, When needed. Kingpact Sprayer EC 11 ft.ot. with 1 NS NS NS NS NS NS NA NA NA Intentment, When needed. Kingpact Sprayer EC 11 ft.ot. with 1 NS NS NS NS NS NS NS NS NA	Spray. Foliat. Sprayer	L.R.TU	24 ft. az./100 sq. ft	SN	NS	NS	N	2 days	NS.	۲ ۲	ž	O days PHI
treatment, When needed. Kinapsack Sprayer EC 11 fl. uz. with 1 NS NS NS NS NS NS NS NA NA NA NA Iteatment, When needed. Runp Sprayer EC 11 fl. uz. with 1 NS NS NS NS NS NS NS NS NA	Georgiana In Use	į.	reenhance									
Ireatment, When needed. Knapsack Sprayer EC 11 ft.uz with 1 NS NS NS NS NS NS NS NA NA NA Ireatment, When needed. Pump Sprayer EC 11 ft.uz with 1 NS NS NS NS NS NS NA	Spin treatment, When needed. Hand Held Sprayer	EC	II flor with I	N	SN	NS	NS	SS	SZ	٧,	42	NS
Ireatment, When needed, Puntp Sprayer EC (1, 1), with NS NS NS NS NS NS NS NA NA NA Use Gruups: Terrestrial & Greenhause Fixad	Spiel treatment, When needed. Knapsack Sprayer	Si Si	11 fl. cz. with 1	S.	NS	NS	S. S.	ž	S.	۷ 2	٧2	NS
Use Groups: Terrestrial & Greenhouse	Spirat Ireatment, When needed. Punty Sprayer	EC	11 (1.02 with 1 qt water	SN	SN	SS	S.	SZ	ž S	۲ ۲	4 2	SZ Z
	Herps	Use Groups:	Terrestrial & Gree									

1	APPENDIX A . C	Case 4083, [Soap	Soap Safts	Chemical	079021	Potassium		Safts of F	Fatty Acids	<u>3</u>		
Page	Application Type, Application Figurera	F.	Maxemen Application Rate	Minimum Application Rec	įŧ	Man & Aggre of Man Real	Mar Wer	Min Interval Retenten Appr & Max Ret	Mentional Entry Interval		graphic Walker	1 matchine 1 matchine shr mat Abbetreeling
Sin Groups SCVL 1-51 water NS NS NS NS NS NS NS N								(Deye)	(Phys)	Allement	Pisothmed	
Project	Spray. Fidiar, Sprayer	3C/L	2.5 II.uz. with I gal water	NS	NS	NS	NS	7 days	NS	V.	٧٧	0 days PHI
Page String Str	Losfy Vegetables	1	Terrestrial & Green									
1957 2 K 1	Spray, Fidiar, Sprayer		2.5 fl oz. with I gal water		SN	NS	NS	e days	NS	¥ 2	۲ ۲	0 days PHI
1 pai vaice Sc7L 1 pai vaice NS NS NS NS NS NA NA 0 days	Legume Vegetables		Terrestrial Fund &	Food						!		i
Parkier, Sprayer Scrit S	Spray. Fidiar. Sprayer		2 5 (), uz. with I gal water	SN	NS	NS	NS	0 days	NS	ž	ž	O days PHI
1. 2.1 1. 1. 1. 1. 1. 1.	Legame Vegetables		Terrestrial & Graco									
Use Groups: Terrearial Fond NS NS NS NS NS NA NA O days	Spray, Fieliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	S. S.	₹	₹ Z	O Jays PIII
W. Fediat, Pump Sprayer L.RTU Unspecified NS NS NS 7 days NS NA NA NA 0 days M. Fediat, Pump Sprayer L.RTU Unspecified NS NS NS NS NS NS NA NA NA 0 days M. Fediat, Pump Sprayer L.RTU Unspecified NS NS NS NS NS NS NA NA NA NA 0 days M. Fediat, Pump sprayer L.RTU Unspecified NS NS NS NS NS NS NS NA NA 0 days M. Fediat. Sprayer Unser Grouper: Terretarial Found & Food NS NS NS NS NS NS NS NA NA 0 days M. Fediat. Pump Sprayer L.RTU Unspecified NS NS NS NS NS NA NA <td>Lettace</td> <td></td> <td>Tencatrial Fixed</td> <td>į</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>ļ</td>	Lettace		Tencatrial Fixed	į								ļ
y. Fuliar, Pump Sprayer L. RTU Land Changes: Terrestrial Found NS NS NS 7 days NS NA NA <td>Spray. Fisliar, Puny Sprayer</td> <td></td> <td>Unspecified</td> <td>NS</td> <td>NS</td> <td>NS</td> <td>NS</td> <td>7 days</td> <td>NS</td> <td>٧</td> <td>٧</td> <td>0 days PIII</td>	Spray. Fisliar, Puny Sprayer		Unspecified	NS	NS	NS	NS	7 days	NS	٧	٧	0 days PIII
y, Fuliar, Pump Sprayer L. RTU Unspecified NS NS NS 7 days NS NA NA <td>Mehras</td> <td></td> <td>Terrestrial Fixed</td> <td></td> <td></td> <td></td> <td></td> <td>į</td> <td></td> <td></td> <td></td> <td>ļ</td>	Mehras		Terrestrial Fixed					į				ļ
1y. Fuliar, Pump Sprayer LRTU 24 th or 1100 and a language. NS NS NS 2 days NS	Spray. Fixliar, Punp Sprayer		Unspecified	NS	NS	SN	NS	7 days	Š	¥	٧	O days PHI
Use Groupe: Terrestrial Food & Food NS NS NS 7 days NS NA NA 0 days 19. Fulier. Sprayer SC7L 2 5 ft a.c. with large cifed NS NS NS NS NS NA NA NA NA 19. Fulier. Sprayer Use Groupe: Terrestrial Found & Food 19. Fulier. Pump Sprayer Use Groupe: Terrestrial Found & Food 19. Fulier. Pump Sprayer L.RTU Umposcified NS NS NS NS NS NA NA NA NA 19. Fulier. Pump Sprayer L.RTU 24 ft a.c./100 NS NS NS NS NS NS NS	Spray. Foliar, Pump Sprayer	LRTU	24 (1 oz 7100 sq. (1	N.	SN	NS	SN	2 days	SN	ž	<u>د</u> 2	(1 days PHI
1. Finler. Pump sprayer L. RTU Unspecified NS NS NS 7 days NS NA NA NA O days 1y. Fuller. Sprayer Scrit. 2. S. fl. iv. with Strayer NS NS NS NS NS NS NA <	Oka		Terrestrial Fixed								ļ	
Use Groups: Terrestrial Fund & Food Use Groups: Terrestrial Fund & Food Use Groups: Terrestrial Fund & Food Type Sprayer Use Groups: Terrestrial Fund & Food Use Groups:	Spray, Fichias, Pump aprayer		Unspecified	NS	NS	NS	SS	7 days	SS	ž	Y Z	U days PHI
ayer SC/L 2 \$ fl.or. with lead water NS NS NS 7 days NS NA	Peants		Terrestrial Food &	Food								
The Groupe: Terredicial Food Application of Sprayer L.RTU Unspecialist NS NS NS 7 days NS NA NA NA NA NA Sprayer L.RTU 24 II .d., / (4) NS NS NS 2 days NS NA	Spray. Foliar. Sprayer	3C/L	2.5 (Laz. with 1 gal water	NS	N S	NS	NS	7 days	NS	ž	ž	0 days P111
np Sprayer L.RTU 24 fl 11.2./100 NS NS NS 7 days NS NA NA NA NA Np Sprayer L.RTU 24 fl 11.2./100 NS NS NS NS 12 days NS NA NA NA	Pess (Umpecified)	Use Groups:		. Food								
L.RTU. 24 IIr./100 NS NS 2 days NS NA NA NA	Spray, Fuliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	S _S	ž	42	0 days PHI
	Spray, Foliat. Puny Sprayer	L.RTU .	24 fl az./100 sq. fl	SZ.	ž	NS	NS	2 days	SN	۲ Z	۲ ۲	O days PH4
			·	•								•

Page A VICENIUS A Cace	o diff. ISon	Salici	Chemical	120820	Potessing	1	Salte of Fatty Acidel	atte Ari	13		
	t om	irm Kate		Mes.	Max # Arps ## Max Rate	# D 3	Min bacoul Between App @ Max Rote	Resented Fatty Interval		i iri yrapha I umfaireer	11st Limitatean also nec Abbreviatean
							(Payer	(Ibys)	Alkmed	Desplanent	
Paper	Use Groups: T	Terrestrial Fund						•			
Spray. Foliar. Pump Sprayer	L.RTU	Unspecified	SN	NS	NS	NS	7 days	NS	NA	VN	O days PIII
Spray. Foliar. Pump Sprayer	L.RTU	24 ft az./100 sq. ft	NS	SN	NS	MS	2 days	SN	NA	V.	O days PHI
Piecepple	Use Groups:	Terrestrial & Greenhause	brease Found								
Spray. Foliat. Sprayer	SC/L	2.5 ft oz with I gal water	NS	SN	NS	NS	7 days	SN	4	٧×	O days PHI
Peare Froits	Use Groups: T	.5	Feed								
at. Sprayer	SC/I.	2 5 () oz with 1 gal water	SN	NS	NS	NS.	7 days	NS	N.A.	VN .	0 days PHI
Spray, Postharvest. Sprayer	SC/L	2.5.11 oz with 1 gal water	NS	NS	. NS	NS	NS	N.S.	4 2	۷ ۷	0 day> PHI
Presso, White/Irish	Use Graups: T	errestrial Fund &	Food								
ny Sprayer	L.RTU	Unspecified	NS	NS	NS	NS	7 days	NS	Ϋ́Z	42	U days PHII
Prophie	Use Groups:	Terretrial Fixed									
Spray. Fuliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	¥ Z	٧,	0 days PHI
Spray. Fuliar. Punp Sprayer	L-RTU	24 f) av 7100 ×q. f)	NS	NS	SZ	SS.	2 days	SN	۷ ۲	۷ ک	U days PHII
Redich	Use Genaps:	Terrestrial Food									
Spray. Fuliar. Pung Sprayer	L.R.TU	Unspecified	NS	SS	NS	NS	7 days	NS	×Z	Y.	O days PHI
Rape	Use Grups: T	creatist Food	& Foed								
Spray. Foliar, Sprayer	SC/L	2.5 il oz. with I gal water	NS	NS.	SZ	SS	7 days	SN	4 2	¥Z	O days PHI
Runt and Tuber Vegetables	Use Genups: T	Terrestriel & Greenhuse	hune Food								
Spray. Foliar. Sprayer	SC/L	2.5.11 oz. with I gal water	NS	NS	Ş	SZ	0 days	SS	42	۲ ۲	O days, PHI

APPENDIX A. CASE	se 4083, [Soap	Soap Salts]	Chemical	079021	(Potassium		Salts of Fatty Acids	atty Aci	ţs)		
511) Application Type, Application Forms, Application Equipment	- Ferm	Max umam Applications Rate	Meanum Application Rate	Man 4	Man has	Max & Apple & Max Rec	Min Interval Between Appr & Max	Mentissed Fator (men.el	Circum En	färgeste. I unitatore	Use Umsteinte alos soc Abbecustives
							(db)+1	(fbps)	Albert	Ihadlamed	
Rent and Tuber Vegetables	Use Groups:	Terrestrial Food						•			
	1	2.5 il oz with I gal water	NS .	NS	NS	NS	O days	NS	Y Z	٧٧	0 days PHI
Satest Freie	Use Ormpe:	-	& Feed								
iar. Sprayer	1	2.5 fl uz. with I gal water	NS	NS .	SN	NS	7 days	SN	NA	V.	O days Pill
Spray. Pustharvest. Sprayer	SC/L	2.5 Il oz with 1 gal water	NS	. SN	SN.	NS	SN	SS	Y Z	٧ ٧	O days PIII
Squash (All or Unepocified)	Use Groups:	Terrestrial Fresh									
ıçı		24 ft ov /1000	SN	SS	NS	NS.	2 days	NS	٧N	٧ ٧	O days PHH
Squark (Summer)	Use Graups:	Terrestrial Fond									
Spray. Foliar, Pump Sprayer	L.RTU	Unspecified	SN	NS	NS	NS	7 days	NS	ď Z	٧ <u>٧</u>	O days PHI
		Terrestrial Fund									
ump Sprayer	L-RTU	Unspecified	SN	SN	SN	NS	7 days	NS	ž	٧×	O days PHI
	Use Grape:	Terrestrial Found			į						
Spray. Fibliat, Pump Sprayer	L·RTU	Unspecified	NS	SS	SS	NS	7 days	NS	4	4 Z	O days PHI
Serme Fruits	Use Gramps:	Terretrial Food									
ar. Sprayer	SC/L	2 5 ft uz. with I gat water	NS	NS	NS	NS	7 days	S	Y Z	ď Ž	0 days PHI
Spray, Postharvest, Sprayer	SC/L	2 5 fl nz. with I gal water	NS	NS	NS	SN	SN	SX	۲ ۲	Y Z	0 days P111
Subtrupical/Trupical Fruit	Use Graups:	Terrestrial Foud & Feed	Feed								
yer	SCIL	2.5 fl og with I gal water	NS	NS	NS	SN	7 days	SN	4 2	Y Z	O days PHII
Spray, Pusharvest. Sprayer	SC/L	25 flox with 1 gal water	S. Ž	SZ SZ	SN	NS	SN	NS	۷ 2	٧ 2	0 days 1411

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APPENDIX A Ca	rse 4083, [Case 4083, [Soap Salts]	Chemical	079021	Potassium		Salts of Fatty Acids	illy Acid	is Si		1
İ		Maximum Application Rec	Mosmen Application Res	Mar e	Mas # #	Max 6 Appr 66 Max Rate	Mar Interval Retineen Agra @ Max Rat	Restricted Units Interval	1	f ez sy szyba E uruszán erra	for Landonen alm var Abbreviatien
							(fluys)	(d)eys)	Altered	Deathmed	
Tomato	Use Grupps:	Terrestrial Food &	& Food					•			
Spray. Fediar. Punp Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	٧V	٧N	O days P111
Spray, Fishiar, Pump Sprayer	L-RTU	24 fl. 02./100	NS	. NS	S.	SN	2 days	NS	Y.V	٧×	U days Ptif
Tree Nats	Use Geraps:	7	& First								
Spray, Foliar, Hand Held) 13	fill az with I gali water	SX	NS	NS	NS	skep ş	NS.	NA	NA	O days PHI
Spray. Fuliar. Power Sprayer		\$ fl oz. wah i gal water	NS	NS	SN .	NS	s days	NS	٧N	¥N .	O days PIII
Spray, Fuliar. Sprayer	SC/L	2 5 (1 n/ with 1 gal water	NS	SN	N.S.	NS.	7 days	NS	Y Z	V	O days PHI
Spray. Pustharvest. Sprayer	SK7L	2 5 Il oz wells 1 gal water	NS	NS	SN	, NS	NS	NS	٧	٧ ٧	0 days PHI
Vegetables (Umpocified)	Use Groups:	Temestrial Feed									
Spray. Foliar, Hand held Sprayer	DE	5 Il n/ with I gal water	SN	NS	NS	NS	5 days	ž.	٧,	₹ Z	t) days PHII
Spray. Fuliar. Power Sprayer	EC	5 ft oz. with 1 gal water	NS	NS	NS	NS	5 days	SS	«	٧ ٧	O days PHI
Vegetables (Unapocified)	Use Grups:	Terrestrial & Greenbause	ъчие Бия								
Spray. Foliar, Hand held Sprayer	EC .	S fl az with 1 gal water	SN .	NS	SN	NS	S days	NS	٧ 2	4 Z	O days PIII
Spray. Foliar. Power Sprayer	D3	5 fl oz. with 1 gal water	Ş	NS S	SZ	NS	5 days	NS	Š	۷ ۲	O days PHI
Vegetables (Umpocified)	Use Groups:	Terrestrial Found &	Food								
Spin Treatment. When Needed. Punt Sprayer	L.RTU	Unspecified	SZ	SN	SX	NS	NS	NS	ž	۲ ۲	O days PHI
Spray, Fuliar, Puntp Sprayer	L-RTU	Unspecified	NS	NS	ž	SS.	S days	NS	۲ ۲	42	U days PHI
Wheat	Use Graps:	Use Grusps: Terrestrial Fund & Feed	Feed								

APPENDIX A. Case	4083, [Soa	Soap Salts	Chemical	079021	Potassium		Salts of F	of Fatty Acids]	(ks)		
MII Application Type, Application Tenary, Application Equipment	è orm	Maximum Application Rac	Munimum Application Bak	eddy 9 TYN	Man P. Ayra Go	Max 8. Appr 49. Max Max	Mus bacoval Between Apps & Max Rate	Reservated Lanny Inservat	nur ş Bosos	Carrytaphic I unitatores	Use Lumpialisms also see Abbrevialisms
							(flaps)	() (m) ()	Alteres	Draftwed	
Spray. Foliar, Sprayer	SC/L	2.5 If oz. with I gat water	SN	SN	SN	NS	7 days	SN	٧N	4N	O days PHI
NONFOOD/NONFEED USES											
Cata (AdelanGinem) Us	Use Groupe: 1	ladinor Residential									
When needed, Punty Sprayer	1 1		NS	. SN	NS	NS	0 days	NS	ď Z	4	NS
Animal treatment. When needed. Pump Sprayer	SC/L	6 flor with 1 gal water	NS	SN	NS	NFS	O days	SS	4 Z	۲ ۲	NS
Shangun. When needed. By hand	L.RTU	Unspecified	NS	NS	NS	NS	NS	NS	ž	¥ Z	NS
Cussus reis/Maritations/Industrial Premises/Equipment	(Chaldene)	Use Group: Terrestrial Non Frond	arial Non Food								
Spray. When needed. Sprayer	SC7L	6 flor with 1 gal water	SS	Š	ž	Š.	NS	S.	۲ 2	۲ 2	NS
Daga/Canines (Adults/Puppies)	Use Grisspe:	Indus Residential									
ed. Panp Sprayer	L RTU	Unspecified	NS	SZ	NS	SS	O days	SZ	ž	۷ ۷	NS
Animal ircaiment. When needed. Punyi Sprayer	7/JS	6 Il oz. with 1 gal water	NS	N. SX	N S	Š	O days	ž.	ď.	۲ ۲	SN
Shampun, When needed. By hand	L. RTU	Unspecified	Š	NS	NS	SS	NS	NS	ž	4	NS
	Use Groups:	Outdeny Residential	-	ļ							
Spray. When needed. Sprayer	3C/L	6 Il az. with I gal water	SN.	Š.	Š	SN	NS	SZ	۲ ۲	۲×	SS.
Spray, When needed. Sprayer	LIRTU	J2 fl oz./50 ×q ft	NS	ž	SZ SZ	SZ	SN	NS	ž	42	S
France Fir (Fivers/Shelterbelt)	Use Graps:	Furestry									
Spray. Foliar. Sprayer	SC/L	3 0 oz. with 1 gal water	SS.	ž	SN	NS	NS	NS .	Ž	₹z	NS
Groenhuser-Earlity	Use Graupe:	Indust Non-Food									
Spray, When needed. Sprayer	SCIL	6 () ov with gal water	SN	Š	ž	NS:	S.S.	SN .	۲ ۲	٧ ۲	S

Sec A NUMBER	e 4083	4083 ISpan Saltel	Chemical	079071	I Polyaccinam	1	A Jo Ba	A	-		
	,	leanner description		170/10		- 1	Sails of Fally Acids	ACION ACI	3		
MII Application type, Application luning, Application Lymposium	-	Maumen Application Rise	Minumen Application Rate	A PER	Mar Bare	Man # Age of Man Rock	Min descrat Between Ages of Man	Restrated Fairy Increas		Gergraphic Paritations	lyr I unskrins also ser Alther salonta
							(Ilays)	(Pays)	Allend	Darthmed	
Household/Dumentic Dwellings	Vec Grape:	Induse Residential						,			
Spray. When needed. Sprayer	EC	2 5 fl. oz. with I gal water	NS	NS	NS	NS S	14 days	SN	۲ ک	۲ ۲	NS
Househuld/Duncatic Dwellings Contests	Use Groups:	Indust Residential					į				
Sput treatment. When needed, Pump Sprayer	L.RTU	Unspecified	NS	NS	NS	SN SN	7 days	NS	ž	٧×	NS
Spist treatment. When needed. Pump Sprayer	SC/L	6 (), oz. with I gal water	NS	NS	NS	SS	7 days	SN	۲ ک	¥ Z	NS
Spray, When needled. Sprayer	EC	2.5 If ay with I gal water	NS	SN.	SN	Š	14 days	SZ SZ	₹ Z	₹	NS
Household/Dunnestic Dwellings Indoor Premiers	Use Gnape:	Indian Residential									
Sput treatment. When needed, Punp Sprayer		Unspecified	NS	NS	NS	NS	7 days	NS	٧V	¥ Z	NS
Sprit treatment. When needed, Punp Sprayer	SCIL	6 Il oz. with I gal water	NS	NS	NS	SN	7 days	NS	٧×	4 Z	NS
Hauschald/Dumestie Dwellings Outlany Premises	Use Grou	Vec Graups: Chadenir Residential	ential								
Spiel treatment. When needed, Puny Sprayer	L-RTU	Unspecified	NS	SN	NS	NS	7 days	NS	٧٧	NA	NS
Spray. When needed. Sprayer	SC/L	6 fl oz. with I	NS	SN	NS	SN	SN	NS	٧N	V N	SN
Spray. When inceded. Sprayer	L.RTU	32 fl. oz.750 sq. fl.	SN	SN	NS	NS:	NS	NS	Y X	٧٧	SN
Ornamental Herbacorus Plants	lac Graups: T	Use Graps: Terrestrial Nua Frud	& Children	Residential							
Soil Drench. Container. Not on Label	SC/L	2 gal with 1000 gal	NS	SN	NS	NS	NS	NS	۷	٧٧	NS
Spin treatment. When meeded, Hand held Sprayer	EC	16 fl oz with 1 qt. water	NS	NS	NS	NS	NS	NS	V.	٧٧	NS
Spin treatment, When inceded, Kimpsack Sprayer	EC	16 fl oz. with 1 qf water	SS	SN	SN	SN	SN	NS	¥.	٧×	NS
Sput treatment. When needed. Punp Sprayer	I. RTU	Unspecified	. NS	NS	NS	Š	NS	Š	٧٧	NA	NS

1						ł	3		•		
APPENDIX A C2K	Case 406.5, [Soap	Soap Sans	Chemical	178/5	Lotassium	- 1	Sails of Pally Acids	IIIy AC	<u>.</u>		
SIII Application Type, Application Tuning, Application Equipment	•	Marumum Application Rat	Munimum Applinsteen Kee	M c s App	Mas Park	Mai Na 6	Min bacous Between Ages @ Mas Rate	Mestival Laty Interval		d ar ug s agaba. I amean an	Use Invatation dos see Abbreviations
							(1hys)	(dhys)	Alkmod	I hadhmad	
Spist treatment. When needed, Pump Sprayer	19	16 fl. oz. with 1 gal water	NS	SN	NS	NS	NS	SN.	V V	٧ ٧	S
Spray. Fuliar. Hand held Sprayer	ЕС	S (Loz. with t gal water	NS	NS	NS	NS	S days	S.	۲ ۲	42	NS
Spray, Fuliar, Pump Sprayer	L·RTU	Unspecified	NS	NS	NS	NS	0 days	NS	٧	4 Z	NS
Spray. Fivliar. Power Sprayer	.	5 (1.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	۲ 2	۲ ۲	NS
Spray. Fuliur. Sprayer	sca	2.5 fl.tz. with I gal water	NS	SN	S.	NS.	7 days	NS	٧ ٧	Y Z	NS
Consumate Herbacouse Pleats	Use Groupe:	Terrestrial & Greenbe	Britan Pino Frind	-							
necked. Sprayer	SCAL	2.5 If oz. with I gal water	NS	SN	SN	NS	NS.	NS	<u>۲</u>	¥ Z	NS
Spray. Fuliat. Sprayer	SC/IL	2.5 fl.oz with I gal water	SN	NS	NS	NS	7 days	S	۷ 2	٧	SS
Cymamental Herbacows Plants	Vec Graupe:	Greenhings Ning Frank	busi	:							
ayer	LRTU	Unspecified	NS	SN	NS	. NS	S days	NS	¥	4	NS
Suil Drench. Container. Not on Label	SC/L	2 gal with 1100 gal water	NS	NS	NS	NS	SN	NS	٧	٧ ٧	SN
Spray. Fisliar, Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	Z S	s days	SS	ž	۲ ۲	NS
Spray, Fuliar, Pump Sprayer	L.RTU	Unspecified	NS	NS	NS	NS	5 days	RS	¥Z	٧×	NS
Spray. Fisiar. Power Sprayer	EC.	5 it oz. with l gal water	NS	SS	NS.	Z Z	s days	NS.	< z	42	NS
Spray, Foliar, Sprayer	SCYL	2.5 fl.oz. with 1 gal water	NS	SN	S.	Š	7 days	SN	۲ 2	۲ 2	NS
Ornamental Herbacoma Planta	Use Graspa:	Indian Non Fraud									
ayer	SC/I.	2.5 fl.oz. with i gal water	SN	NS	SN	NS	SN	SX	۲ ۲	٧ ٧	NS.

APPENDIX A. Case	e 4083, E	4083, [Suap Salts]	Chemical	079021	Potassium	1	Salts of Fatty Acids!	illy Aci	圣		
Mit Application Type. Application Lording, Application Lapsacoperent	am. f	Marumum Aggikatum Kak	Meenen Applacien Ras	App.	Man & Agen G	Max e Appe G Max Rac	Mo becool Release	Restricted Unterp Exercel	ing.	i ergengha. Leptikale eus	1 to 1 grades and also sor Albhur teats and
							illeysi	(Illaps)	Alkmed	Dadlowed	
Spray. Fuliat. Sprayer	SC/L	2.5 ft oz with I gal water	NS	NS	SN	NS	7 days	NS	VN	٧٧	NS
Ornamental Herbaccous Plants	Use Grusps:	ndour Residential									
	L·RTU	Unspecified	NS	SN	NS	NS	7 days	NS	٧N	NA	NS
Soil Drench, Foliar, Pump Sprayer	L.RTU	Unspecified	NS	SN	SN	NS	5 days	NS	٧٧	NA	NS
Soil Drench, Container. Not on Label	sc/L	2 Thup with (at water	NS	SN	NS	NS	30 days	NS	NA	V.	NS
Spea Treatment. Bluum. Sprayer	SC/I.	2.5 fl.nz. with 1 gal water	NS	SN	NS	NS	NS	NS	4	٧٧	NS
Spray, Foliar, Hand held Sprayer	EC	S II oz with I gal water	NS	SN	NS	NS	5 days	NS	٧٧	V.A	NS
Spray, Foliat, Dunp Sprayer	I. RTU	Unspecified	NS	SN	SN	NS	2 days	NS	NA	٧	NS
Spray. Foliat. Power Sprayer	EC	5 il.oz. with I gal water	NS	SN	N.	NS	5 days	NS	Y Y	V.	NS
Spray. Fuhar, Sprayer	SC/L	2.5 fl.oz. with I gal water	NS	SN	SN	SN	2 days	NS.	Y Y	V.	NS
Chramonial Lawres and Turf	Use Grupe:	Cerrential Non-Food	& Cutdon	Residential							
Sput treatment. When needed. Hand Held	EC	16 ft oz. with 1 qt. water	NS	NS	SZ	S	NS	S	¥	Y X	NS
Spiri treatment. When needed, Knapsack Sprayer	ЭЭ	16 fl.oz. with 1 qt. water	NS	SN	NS	NS	NS	NS	A A	۲×	NS
Spin treetnem. When needed. Puny Sprayer	LRTU	Unspecified	NS	NS	NS	NS	NS	NS	٧	۲	NS
Spest treatment. When needed. Pung Sprayer	EC	16 fl.oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	4 2	۲ ۲	NS S
Spray. When needed. Sprayer	SC/L	4 () oz. with I gal water	NS	NS	SN	NS	NS	SS	× Z	٧ ٧	NS.
Spray, When needed. Sprayer	3K.\L	2.5 fl oz with I gal water	Š	SN	N.	NS	NS	NS	Y.	٧ ٧	NS.
	L										

APPENDIX A. CASE		4083, [Soap Salts]	Chemical	079021	(Potassium		Safts of Fatty Acids	illy Aci	dsi		
5fff: Application Type, Application Loning, Application Equipment	f uma	Mas uman Application Robe	Manumum Applicatur II oc	addy # 1994	Max & Age & Max Max	Mar # Appr O Mar Res	Min Janerus Betwaen Agra & Man Rafe	Restricted 1 ntg	likini Mini	Geregraphia: sentials are	11cc 1 createsisme abs: mc Abbreviations
							(flays)	Illayst	Allamed	Nasilimed	
Overcental Wouldy Shrube and Vince	Use Groups: T	creating Non-Food	& Chidon	Residential				,			
Bark Treatmett. Foliar, Sprayer	SC/I.	f flor with I	NS	SN .	NS	SN	MS	NS	٧٧	V.	NS
Bark Treatment. When needed. Sprayer	SC/L	2.5.0, az., with I qi water	NS	SN	NS	SN	NS	NS	٧N	V.	NS
Soil Drench Treatment. Container. Not on Label	SC/L	2 gal with 100 gal water	NS	SN	NS	NS	NS	NS.	٧٧	Y.	SN
Spirit Treatment, When needed, Hand Held	EC	16 Il oz with 1	NS	NS	SN .	NS	NS	NS	Y Z	NA	NS
Spin Treatment, When needed. Knapsack Sprayer	Э	In Boz. with I	NS	NS	NS	NS	NS	NS	₹ Z	٧×	NS
Spin Treanneni. When meded. Punp Sprayer	.ec.	to it or with t	NS	NS	NS	NS.	NS	NS	٧ ٧	¥ Z	NS
Spid Treatmend, When needed. Sprayer	SC/L	4 fl oz. with I gal water	NS	NS	NS	NS	NS	NS	ž	¥ Z	NS
Sput Treatment. When needed. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	N.S.	٧×	42	NS
Spray, Fisher, Hand held Sprayer	EC	S. II. oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	¥ Z	۲ ۲	NS
Spray. Fuliat, Punp Sprayer	L RTU	Unspecified	NS	NS	NS	NS	U days	NS	YZ.	٧٧	NS
Spray, Fuliar, Power Spiayer	. J	f (3 nz. with 1 gal water	SN .	NS	NS	NS	5 days	NS	۲	۲ ۲	NS
Spray, Foliar, Sprayer	SC7L	3 fl oz. with I gal water	NS	NS	NS	NS	7 days	NS	٧×	42	SN
Spray. Early Spring. Sprayer	SC/L	1.5 fl. oz. with I gal water	NS	NS	NS	NS.	NS	SX	٧ ٧	٠ ٢	NS
Spray. Fall, Sprayer	SC/L	S fl oz. with 1 gal water	NS	NS	NS	SS	NS	NS NS	٧ ٧	۲ ۲	NS
Spray. Spring. Sprayer	SCIL	S II or with E gal water	Z Z	NS	S.	SN .	N.	SS	۲ ۲	٧ ٧	NS

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APPENDIX A CR	se 4083, [Case 4083, [Soap Salts]	Chemical	079021	Potassium	1	Satts of Fatty Acids	alty Aci	F		
Mf. Appleaten Type, Application Timing, Appleaten beginnern	- Frema	Maximum Application Res	Muserum Apple aires Rac	Man 4 Appu	Age of Ker Ker	- 9 3	Min Internal Beimann Apps & Max Rate	Reserved Entry Interval		¹ érigenghir 1 amkatany	He I presenting also: acc
							tibyst	d by st	Albrad	l'hadkmol	
Chramicals Woody Shribs and Vinco	Vec Groups:	Orceahunge Nun-Food	poo							•	
Soil Dreach, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	S days	NS	4 Z	٧٧	NS
Soil Drench, Container. Not on label	SC/L	2 gal with 100 gal water	NS	SN	NS.	NS.	N/A	SN	٧×	٧N	SN
Spray. Foliar, Hand held Sprayer	EC	5 f) oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	٧V	N	NS
Spray. Foliar. Pump. Sprayer	L-RTU	Unspecified	NS	NS	SN	NS	S days	SN	4 2	۷۷	NS
Spray. Foliar. Power Sprayer	EC	5 fl 197, with J gal water	SS	NS	SN	NS	S days	NS	¥ Z	V.	NS
Spiny. Foliar. Sprayer	SC/L	2.5 Il 117 with I gal water	NS	NS	N.S	NS	7 days	NS	Y Z	NA	NS
Ornamental Woody Shruha and Vinca	Use Group: In	名									
Spray. Fisliar, Sprayer	SC/L	2.5 Il oz. weth I gal water	NS	NS	NS	NS	7 days	NS	٧ ٧	٧ ٧	NS
Ornsentedal Wandy Shrubs and Vince	Use Graspe:	Indian Residential									
Soil Dene, Foliar, Pump Sprayer	L:RTU	Unspecified	NS	NS	SN	NS	S days	NS	٧×	٧	NS
Soil Drench, Container, Not on label	SC/L	2 Thsp with 1 41 water	NS	NS	NS	NS	30 days	NS .	۲ ۲	۲×	NS
Spray. Foliar, Hand held Sprayer	EC	5 ft.oz. with t gal water	N.	· NS	NS	NS	S days	NS	۷ ۷	AN .	NS
Spray. Foliat, Pump Sprayer	LRTU	Unspecified	NS	NS	NS	NS	2 days	NS	Y.	٧٧	NS
Spray, Foliar, Priwer Sprayer	EC	5 flow with I	NS	NS	NS	NS	5 days	Š	۲ 2	۲ ۲	NS
Spray. Foliar. Sprayer	SC/L	2.5 B. ty with I gal water	NS	NS	NS	S.	2 days	S.	۲ ۲	₹	SS
(brasmentel and/or Shade Trees	Use Grupe:	Cerreatial Nan Frad	& Chadan	Residential							
Bark Treatment. Foliat. Sprayer	SC/I.	S flow with 1 gal water	SS	S N	Š	S.Z.	NS	. NS	ć Z	< 2	NS:
					T						

APPENDIX A CASE	e 4083, I	4083, [Soap Safts]	Chemical	079021	[Potassium	1	Salts of Fatty Acids!	atty Aci	3		
MIE Application 1yps, Application linuae, Application Department	m. l	Maximum Appluation Rele	Mismun Application Rac	Mary &	Man & Appe & Man Rank	Max 6 App 6 Nan Roc	Men bacrost Between Appe & Man	Reservand Latery Interval	<u> 3 1</u>	Gergraphis L'instalvan	Use Landalves also are Abbacousives
							(Bhy 1)	thyst	Allend	l basikmed	
Bark Treatment. When needed. Sprayer	SC/L	2 f fl oz. with I gal water	SN	NS	NS	NS	NS	SN.	٧N	٧N	SN
Bark Treatment. When needed. Sprayer	SC/L	I gi with 3 gi water	NS	NS	SN	NS	NS	NS	٧2	VN	NS
Bark Treatment. When meded. Sprayer	SC/L	6 fl oz with light	NS	NS	NS	NS	NS	NS	NA	V.V	NS
Spon treatment, When needed. Hand held Sprayer	EC	16 f) az with l yi water	NS	NS	NS	NS.	NS	SN ·	٧N	٧N	NS
Spot treatment. When needed. Knapsack Sprayer	EC	16 II oz with I ql water	NS	Z.	NS	NS	NS	NS	٧	42	S. S.
Sput treatment. When needed. Pump Sprayer	LRTU	Unspecified	NS	NS	NS	NS	NS	NS	42	4 2	RS
Spin treatment. When incided. Pump Sprayer	EC	16 fl oz. with 1 qt water	NS	NS	NS	NS	NS	S S	۷ ۲	₹ Z	NS.
Sprit Iteatmetal, When needed. Sprayer	SC/L	4 fl nz. with t	NS	NS	SN	NS	NS	NS	۲ ۲	₹ Z	S
Spray. Foliar, Foliar, Hand held Sprayer	ЭЭ	5 f) uz. with I	NS	NS	NS:	NS	S days	NS.	42	۷ Z	NS
Spray, Folier, Pump Sprayer	LRTU	Unspecified	NS	NS	NS	NS	2 days	NS	٧×	42	NS
Sprny, Foliae. Power Sprayer	EC	5 Il. w. with 1 gal water	NS	NS	NS	NS	S days	NS	۲ ک	₹ Z	S
Spray. Foliar. Sprayer	SCAL	5 fl oz with l	NS	NS	NS	NS	N/A	S.S.	۲ ۲	٧	NS.
Spray. Early Spring. Sprayer	SC/L	1.5 I) oz. with I gal water	NS	NS	NS	NS	٧/٧	NS	Y Z	42	NS
Spray. Fall, Sprayer	scr	S it is with I	NS	Z.	SS	NS	N/A	SS	Y Z	42	ZS.
Spray. Spring. Sprayer	SCAL	S (1, oz with 1 gal water	NS	SZ	S	SN	N/A	SZ	۲ ۲	Y V	SZ
Ornamental and/or Shade Trees	Use Graups:	Greenhuse Non Fund	end.								

APPENDIX A. Case 4083, [Soap Salts]	e 4083, [Chemical	079021	[Potassium	1	Safts of Fatty Acids	ıtty Aci	辛		
MIE Aggebasien Type, Aggebrutien Eurug, Aggebrutien Eggeptern	Form	Masuman Application Res	Myseman Application Rose	Man & Apple	Mar App of Mar W	N S S S S S S S S S S S S S S S S S S S	Min brachel Belowen Appr & Man	Restricted fastry beserved	tray	terugageber Emplekens	line Limitations also see Albervadints
					•		ifbysi	(flays)	Allemend	[has]hmed	
Spray. Foliar. Hand Held Sprayer	EC	S fl oz. with t gal water	NS	SN	SN	NS	5 days	SN.	٧N	٧٧	NS
Spray, Fuliar, Power Sprayer	EC	Sill ov with I gal water	NS	NS	NS	NS	5 days	NS	4	۷ ۲	NS
Ornamental and/or Shade Trocs	Use Gruspe:	Indust Residential									
	EC	f fl oz. with l gal water	NS	SN	NS	NS	5 days	NS	NA.	¥Z	NS
Spray, Filliat. Pump Sprayer	L-RTU	Unspecified	NS	SN	SN	NS	2 days	NS	۷ ۷	4 Z	NS
Spray. Fidier, Riwer Sprayer	EC	f () oz. with (gal water	NS	NS	NS.	NS	\$ days	S.	₹	۷ Z	NS
Oppuspectal Numburecting Places	Use Graps:	Terrestrial & Greenbouse	Sause Nam Fund	-							
Spiayer	SC/IL	1 gal water	NS	SN	NS	NS	NS	NS	X	٧ 2	NS
Spray. Fidies. Sprayer	sc.r.	2.5 fl.oz. with Lgal water	NS	NS	SS	NS	7 days	S	ď Z	۲ ۲	NS
(bramental Numfawering Plants	Use Graps:	вавин Мов-Food					. [
Spray. Foliar, Sprayer	SC7L	2.5 fl.oz. with I gal water	NS	SN S	SN	NS.	7 days	NS	<u>۲</u>	ď Z	NS
(benaenand) binaftererering Plants	Use Grimps:	Indust Residential									
Spray. Foliar, Sprayer	SC/L	2.5 fl.oz. with I gaf water	NS	NS	S	S.	7 days	S	۲ ۲	ď Z	NS
Purity/Puties 1	Use Groups:	Terrestrial Non Food	& Checker	Residential							
en needed. Sprayer	SC/L	6 B. oz. with I gal water	NS	SZ .	NS	S.	7 days	NS	ď Z	« z	SN
Spray, when needed. Sprayer	L.RTU	32 fl. oz. /50 sq. fl.	NS	SN	SN	SZ.	7 days	NS	۲ ۲	¥Z	NS
Paved Arrae (Private Rinade/Sidewalks)	Use Graups:	Terrestrial New Freed	d & Chichur Residential	caidential							

APPENDIX A CASE	e 4083, [4083, [Soap Safts]	Chemical	079021	Potassium		Safts of Fatty Acids	ally Aci	4		
SIII: Applicatum Type, Applicatum Tümling, Application Equipment	form	Masemen Application Res	Meumen Application Refe	Mes #	Mes Rec	Mar 6 Appr 6 Mar Rich	Min becruit Beimen Age @ Min Rec	Restricted Fastry Baternol	<u></u>	Grupt geben. I sent also teo	Use Limitalism also see Abbrançaisma
						į	theyas	ifbysi	Alkend	Physik-med	
Spiritreatment, when needed, Hand held Sprayer)	16 fl.oz. with I gr water	NS	SN	NS	NS	NS	NS	٧N	٧٧	NS
Spot treatment, when needed. Knapsack Sprayer	EC	16 fl.oz. with 1 qt. water	NS	SN	NS	NS	NS	SN	NA	VN	NS
Spist treatment, when needed. Pump Sprayer	EC	16 fl.ez. with 1 gt water	NS	NS	NS	NS	NS	NS	NA NA	42	NS
Spray, when needed. Sprayer	SC/L	6 (Loz. with I gal water	NS	NS.	۲S	NS	NS	NS	Y.	٧٧	NS
Paved Areas (Private Ruschs/Sidewalks)	Use Grusps: CA	4									
Sprayer	1. RTU	Unspecified	NS	SN	SN	NS	NS	SN	٧N	٧٧	NS
Spray, when needed. Sprayer	L·RTU	32 (B. ey 750 84: 10	NS	SN	SN	NS	NS	NS	۲ Z	٧ ٧	NS
Pet Living/Sheping Querters	Use Groups: (Outdoor Residential									
Spirt treatment. When needed, Puntp Sprayer	REU	Unspecified	NS	SN	NS	NS	7 days	NS	V.	V 2	NS
Pet Living/Steeping Quarters	Une Graups:	Indoor Residential									
Animal hedding. When needed. Pump Sprayer	LRTU	Unspecified	SN	SN	NS	NS	7 days	NS	42	42	NS
Animal hedding. When needed. Pump Sprayer	SC/L	6 fl.oz. with I	NS	NS	S.	S.	7 days	NS	4	۲ ۲	NS
Animal hedding. When needed. Punp Sprayer	EC	2.5 (l oz. with I gal water	NS	NS	ž	S.	14 days	S S	42	4 2	NS
Animal bedding. When aceded. Not on label	EC	2.5 floz. with I gal water	SN	SN	NS	NS	14 days	NS	Y Z	4 Z	NS
Sput treatment. When needed. Pump Sprayer	L.RTU	Unspecified	NS	SN	NS	NS	7 days	NS	٧ ٧	Y Z	NS
Spox treatment. When needed. Pump Sprayer	SC/L	6 fl.oz. with 1 gal water	NS	NS	Š	NS	7 days	NS	¥ Z	4 2	NS
Spray. When needed. Sprayer	EC	2.5 fl oz with I gal water	NS.	NS	Š	ž	14 days	S.	۲ ۲	4 2	NS
Recreational Areas	Изе С ямира:	Terrestrial Non-Frand	P								

APPENDIX A.	APPENDIX A. Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]	Soap Salts]	Chemical	079021	[Potas	Sium S	alts of Fa	atty Aci	dsj		
St FE Application Type, Application Timing, Application Equipment	Form	Medmum Application flate	Minmum Application Rate	Max. # Apps.	Мак. Ф Аррs. (В Мак. Rate	Мих Ф Apps. (6) Мвм. Rate	Min. Interval Between Apps. @ Max. Rate	Restricted Entry Interval	Gea	Geographic Limitations	Use Limitations also see Abbreviations
							(Days)	(Deys)	Allowed	Disallowed	
Spray, when needed, Sprayer	SCA	6 fl. oz. with t gal water	SN	SN	NS	SN	NS	SN:	Ą	NA	NS
Tobacco	Use Groups:	Terrestrial Non-Food	Pa								
Spray, Foliat, Sprayer	SCAL	2.5 fl. oz. with 1 gal water	SW	SN SN	NS	NS	7 days	NS	¥.	NA NA	NS

Abbreviations used

max-maximum; min-minimum; apps-applications; not spec-not specified; na-not applicable
SCAL-Soluble Concentrate(Liquid; SC/S-Soluble Concentrate/Solid; L-RTU-Liquid-Ready To Use; EC-Emulsifiable Concentrate
ai-active ingredient; a-acre; ppm-parts per million; vol.=volume; II oz.=fluid ounce; gal-gallon; sq. ft-square foot
NA-Not Applicable; NS-Not specified; 0 days PHI=0 day(s) Preharvest Interval Header: Form: Rate: tn general:

APPENDIX B

Generic Data Requirements for Reregistration of Soap Salts and Data Citations Supporting Reregistration

GUIDE TO APPENDIX B

Appendix B contains listings of data requirements which support the reregistration for the pesticide covered by this Reregistration Eligibility Document. Also, Appendix B contains generic data requirements that apply to the pesticide in all products, including data requirements for which a "typical formulation" is the test substance.

The data tables generally are organized according to the following format:

- 1. <u>Data Requirement</u> (Column 1). The data requirements are listed in the order in which they appear in 40 CFR Part 158. The reference numbers accompanying each test refer to the test protocols set out in the Pesticide Assessment Guidelines, which are available from the National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161.
- 2. <u>Bibliographic citation</u> (Column 2). If the EPA has acceptable data in its files, this column lists the identifying number of each study. This normally is the Master Record Identification (MRID) number, but may be a GS number if no MRID number has been assigned. Refer to the Bibliography Appendices for a complete citation of the study.

APPENDIX B

Generic Data Supporting Guideline Requirements for Reregistration of Soap Salts

61-1	Chemical Identity	. 94241004, 94244001 94242001,
61-2(a)	Description of starting material and manufacturing process	94241004, 94244001 94242001
61-2(b)	Discussion of formation of impurities	94241004, 94244001 94242001
62-1	Preliminary analysis of product samples	94242002
62-3	Analytical methods to verify certified limits	94242002
63-2	Color	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-3	Physical State	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-4	Odor	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-5	Melting Point .	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-6	Boiling Point	94241011, 94244005 94242003, 94243001 94243002, 94243003

63-7	Density, bulk density, or specific gravity	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-8	Solubility	94241011, 94244005
		94242003, 94243001 94243002, 94243003
63-10	Dissociation Constant	94241011, 94244005
		94242003, 94243001 94243002, 94243003
63-12	рН	94241011, 94244005
		94242003, 94243001 94243002, 94243003
63-13	Stability	94241011, 94244005
		94242003, 94243001 94243002, 94243003
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RESIDUE CHEMISTRY

EPA waived 40 CFR Part 158 requirements for reasons discussed in Section III.

OCCUPATIONAL AND RESIDENTIAL EXPOSURE

EPA waived 40 CFR Part 158 requirements for reasons discussed in Section III.

TOXICOLOGY

EPA waived 40 CFR Part 158 requirements and relied on published data cited in the bibliography.

ENVIRONMENTAL FATE

EPA waived 40 CFR Part 158 requirements and relied on published data cited in the bibliography.

ECOLOGICAL EFFECT		Ammon.	Potass.
71-1	Acute Avian oral quail/duck	417671-12	94240004
	·	00096639B	
		00096639A	
71-2	Acute avian diet. quail	417671-13	00096640
	•	417671-14	00010504
		942400-05	
72-1	Fish toxicity bluegill	•	00096636
	fish toxicity rainbow trout		00096637
	•		00157473
			00400662
			04006200

APPENDIX C

Citations Considered to be Part of the Data Base Supporting the Reregistration of Soap Salts

GUIDE TO APPENDIX C

- 1. CONTENT OF BIBLIOGRAPHY. This bibliography contains citations of all studies considered relevant by EPA in arriving at the positions and conclusions stated elsewhere in the Reregistration Eligibility Document. Primary sources for studies in this bibliography have been the body of data submitted to EPA and its predecessor agencies in support of past regulatory decisions. Selections from other sources including the published literature, in those instances where they have been considered, will be included.
- 2. UNITS OF ENTRY. The unit of entry in this bibliography is called a "study". In the case of published materials, this corresponds closely to an article. In the case of unpublished materials submitted to the EPA, the EPA has sought to identify documents at a level parallel to the published article from within the typically larger volumes in which they were submitted. The resulting "studies" generally have a distinct title (or at least a single subject), can stand alone for purposes of review, and can be described with a conventional bibliographic citation. The EPA has attempted also to unite basic documents and commentaries upon them, treating them as a single study.
- 3. IDENTIFICATION OF ENTRIES. The entries in this bibliography are sorted numerically by Master Record Identifier, or MRID number. This number is unique to the citation, and should be used at any time specific reference is required. It is not related to the six-digit "Accession Number" which has been used to identify volumes of submitted studies; see paragraph 4(d)(4) below for further explanation. In a few cases, entries added to the bibliography late in the review may be preceded by a nine-character temporary identifier. These entries are listed after all MRID entries. This temporary identifier number is also to be used whenever specific reference is needed.
- 4. FORM OF ENTRY. In addition to the Master Record Identifier (MRID), each entry consists of a citation containing standard elements followed, in the case of material submitted to EPA, by a description of the earliest known submission. Bibliographic conventions used reflect the standards of the American National Standards Institute (ANSI), expanded to provide for certain special needs.
 - a. Author. Whenever the EPA could confidently identify one, the EPA has chosen to show a personal author. When no individual was identified, the EPA has shown an identifiable laboratory or testing facility as author. As a last resort, the EPA has shown the first submitter as author.
 - b. Document date. When the date appears as four digits with no question marks, the EPA took it directly from the document. When a four-digit date is followed by a question mark the bibliographer deduced the date from evidence in the document. When the date appears as (19??), the EPA was unable to

determine or estimate the date of the document.

- c. Title. In some cases, it has been necessary for EPA bibliographers to create or enhance a document title. Any such editorial insertions are contained between square brackets.
- d. Trailing parentheses. For studies submitted to the EPA in the past, the trailing parentheses include (in addition to any self-explanatory text) the following elements describing the earliest known submission:
 - (1) Submission date. The date of the earliest known submission appears immediately following the word "received."
 - (2) Administrative number. The next element, immediately following the word "under," is the registration number, experimental use permit number, petition number, or other administrative number associated with the earliest known submission.
 - (3) Submitter. The third element is the submitter, following the phrase "submitted by." When authorship is defaulted to the submitter, this element is omitted.
 - (4) Volume Identification (Accession Numbers). The final element in the trailing parentheses identifies the EPA accession number of the volume in which the original submission of the study appears. The six-digit accession number follows the symbol "CDL," standing for "Company Data Library." This accession number is in turn followed by an alphabetic suffix which shows the relative position of the study within the volume. For example, within accession number 123456, the first study would be 123456-A; the second, 123456-B; the 26th, 123456-Z; and the 27th, 123456-AA.

OFFICE OF PESTICIDE PROGRAMS REREGISTRATION ELIGIBILITY DOCUMENT BIBLIOGRAPHY

CONTENT OF BIBLIOGRAPHY. This bibliography contains citations of all publications considered relevant by EPA in arriving at the positions and conclusions stated elsewhere in the Reregistration Eligibility Document. Primary sources for published literature in this bibliography have been the body of data submitted to EPA in support of past regulatory decisions.

- (1) 94241004 Seidman, B. (1990) Safer, Inc. Phase 3 Summary of MRID 00007049. Data Submitted in Support of EPA Registration of Safer's Insecticidal Soap 02: Product Chemistry. 10 p.
- (2) 94244001 Seidman, B. (1990) Safer, Inc. Phase 3 Summary of MRID 00007049. Data Submitted in Support of EPA Registration of Safer's Insecticidal Soap 02: Product Chemistry. 10 p.
- (3) 94242001 Wong, D. (1990) Chevron Chemical Phase 3 Summary of MRID 40157601 and Related MRID 00153393. Product Identity and Composition of Orthomite Insecticidal Soap: Project 8703674 and CBI 8703674. Prepared by Chevron Chemical Company. 16p.
- (4) 94242002 Wong, D. (1990) Chevron Chemical Company Phase 3 Summary of MRID 40157601 and Related MRID 00153393. Analysis and Certification of Product Ingredients of Orthomite Insecticidal Soap: Project 8703674 and CBI 8703674. Prepared by Chevron Chemical Company. 13p.
- (5) 94241011 Seidman, B. (1990) Safer, Inc. Phase 3 Summary of MRID 00007049. Data Submitted in Support of EPA Registration of Safer's Insecticidal Soap 02: Product Chemistry. 8 p.
- (6) 94244005 Seidman, B. (1990) Safer, Inc. Phase 3 Summary of MRID 00007049. Data Submitted in Support of EPA Registration of Safer's Insecticidal Soap 02: Product Chemistry. 8 p.
- (7) 94242003 Wong, D. (1990) Chevron Chemical Company Phase 3 Summary of MRID 00153393. Physical and Chemical Characteristics of Orthomite Insecticidal Soap: Project 8703674 and CBI 8703674. Prepared by Chevron Chemical Company. 7p.
- (8) 94243001 Oberchain, F. (1990) Attack Pesticide Division Phase 3 Summary of MRID 00155278 and Related MRIDs 00154643, 00155271, 00155277. Potassium Salts of Fatty Acids-Aphid Mite Attack Product Chemistry, Part One: Unnumbered Project. 22 p.

- (9) 94243002 Thompson, Paul A. (1991) The Dissociation constant of Hinder. Guideline Reference 63-10. 17 p.
- (10) 94243003 Obenchain, F. (1990) Attack Pesticide Division Phase 3 Summary of MRID 00155278, and Related MRIDs OC154643, 00155271, 00155377. Potassium Salts of Fatty Acids--Aphid Mite Attack Product Chemistry, Part Three: Unnumbered Project 8 p.
- (11) The Condensed Chemical Dictionary, 7th ed., Reinhold Publishing Co., 1966.
- (12) 00164005 McPherson, B. (1991) "Effect of Hydrolysis of Safer's Weed and Grass Killer." Guideline Reference Number 161-1 Hydrolysis. 10p.
- (13) 00157476 Mozol et al. (1991) "Degradation of Fatty Acids of Lawn Soil and the Related MRID 00164 (Fate of Capric and Pelargonic acids in Soil." Guideline Reference 162-1, Aerobic Soil Metabolism. 15p.
- (14) Sax, N. I., and Lewis, R. J. SR, 1989. <u>Dangerous Properties of Industrial Materials</u>, 7th Edition. Van Nostrand Reinhold, New York.
- (15) NIOSH, 1987. Registry of Toxic Effects of Chemical Substances, Washington, DC.
- (16) 41767112 Pedersen, Carol A., "Hinder: 21-Day Acute Oral LD50 Study in Bobwhite Quail," January 24, 1991. Performing Laboratory: Bio-Life Associates, Ltd., Route 3 Box 156, Neillsville, WI 54456. Prepared for: Uniroyal Chemical Company, Inc. Research and Development, 74 Amity Road, Bethany, CT 065225
- (17) 41767113 Pedersen, Carol A., "HINDER: 8-Day Acute Dietary LC50 Study in Bobwhite Quail. "January 23, 1991. Prepared by Bio-Life Associates, Ltd., Route 3 Box 156, Neillsville, WI 54456. Prepared for: Uniroyal Chemical Company, Inc., Research and Development, 74 Amity Road, Bethany, CT 065225.
- (18) 41767114 Pedersen, Carol A., "HINDER: 8-Day Acute Dietary LC50 Studying in Mallard Ducklings. "January 23, 1991. Prepared by Bio-Life Associates, Ltd., Route 3 Box 156, Neillsville, WI 54456. Prepared for: Uniroyal Chemical Company, Inc., Research and Development, 74 Amity Road, Bethany, CT 065225.
- (19) 40066200 Reuter Laboratories, Inc. (1987) Submission of Additional Non-target Wildlife (bird) Data in Support of Registration for Aphid-Mite Attack Concentrate. Compilation of 4 studies.
- (20) 00096636 "Static Acute Toxicity Fish Bioassay, August 4, 1981". Prepared by:

- Applied Biological Sciences Laboratory, 6320 San Fernando Road, Glendate, CA 91201. Prepared for Safer Agro, 5271 Old West Saanich Road, R.R.3, Victoria, B.C., Canada V8X3X1.
- (21) 00157473 " Acute Toxicity of Safer's Herbicide H2 to Bluegill Sunfish (Lepomis macrochirus), November 20, 1985." Prepared by: Analytical Bio Chemistry Laboratory, Inc. P.O. Box 1097, Columbia, MO 65205. Prepared for: Safer Agro-Chem, Ltd., 6761 Kirkpatrick Cresent, R.R.3 Victoria, B.C. Canada V8X3X1.
- (22) 00096637 "Static Acute Toxicity Fish Bioassay, August 5, 1981". Prepared by Applied Biological Sciences Laboratory. Prepared for Safer Agro, 5271 Old West Saanich Road, R.R.3 Victoria, B.C. Candada V8X3X1.
- (23) 94240004 Obenchain, F. (1990) Attack Pesticide Division Phase 3 Summary of MRID 40066202, and Related MRIDs 40053301. Soap-Aphid Mite Attack Concentrate/ An Toxicity Study with the Bobwhite: Project 227-103 & 103A. Prepared by Wildlife International Ltd. 16p
- (24) 94244005 Seidman, B. (1990) Safer, Inc. Phase 3 Summary of MRID 00007049. Data Submitted in Support of EPA Registration of Safer's Insecticidal Soap 02: Product Chemistry. 8p.
- (25) 00096639A Final Report, Acute Oral LD50 Mallard Duck. Project Number: 157-109. March 30, 1981 Study Prepared by: Wildlife International Ltd., Solitude Creek Farm, St. Michaels, Maryland 21663. Prepared for: Applied Biological Sciences Laboratory.
- (26) 00096639B Fink, R.; Beavers, J.B.; Joiner, G.; et al. (1981) Final Report: Acute Oral LD50--Mallard Duck: Safer's Insecticidal Soap #1: Project No. 157-109. (Unpublished study received Dec 31, 1981 under 42697-1; prepared by Wildlife International, Ltd. and Washington College, submitted by Safer Agro-Chem, Jamul, Calif.; CDL:246993-D).
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 Project Number: 208-104. Study Prepared by: Wildlife International Ltd., Solitude
 Creek Farm, St. Michaels, Maryland 21663. Prepared Victoria, British Columbia,
 Canada V8X 3X1.
- (28) 00010504 Final Report, Eight day Dietary LC50 Bobwhite Quail. Project Number: 157-107. April 22, 1981. Study Prepared by: Wildlife International Ltd., Solitude Creek Farm, St. Michaels, Maryland 2166. Prepared for: Applied Biological Sciences Laboratory.
- (29) 00096640 Fink, R.; Beavers, J.B.; Joiner, G.; et al. (1981) Final Report: Eight-day Dietary LC50--Bobwhite Quail: Safer's Insecticidal Soap #1: Project No. 157-107. (Unpublished study received Dec 31, 1981 under 42697-1; prepared by Wildlife

- International, Ltd. and Washington College, submitted by Safer Agro-Chem, Jamul, Calif.; CDL:246993-H).
- (30) 00030865 Condrashoff, S.F. "A Testing Program to Determine Acute LC50 Toxicity to Aquatic Invertebrates of Safer's Insecticide Soap. Forty-Eight Hour Protocol with <u>Daphnnia pulex</u>." Prepared by: Professional Ecological Services, 5271 Old Saanich Road, RR3 Victoria British Columbia, VsX3X1, Canada. Prepared for: Safer's Inc.
- (31) 00096638 Condrashoff, S.F., "A Testing Program to Determine Acute LC50 Toxicity to Aquatic invertebrates of Safer's Insecticidal Soap. Forty-eight Hour Protocol With Daphnia pulex.
- (32) Thompson, Paul A. (1991) The Dissociation constant of Hinder. Guideline Reference 63-10. 17 p.
- (33) Thompson, Paul A. (1991) The Density of Hinder. Guideline Reference 63-7. 11 p.

APPENDIX D

PR Notice 91-2



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

PR NOTICE 91-2

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

NOTICE TO MANUFACTURERS, PRODUCERS, FORMULATORS, AND REGISTRANTS OF PESTICIDES

ATTENTION: Persons Responsible for Federal Registration of

Pesticide Products.

SUBJECT: Accuracy of Stated Percentages for Ingredients

Statement

I. PURPOSE:

The purpose of this notice is to clarify the Office of Pesticide Program's policy with respect to the statement of percentages in a pesticide's label's ingredient statement. Specifically, the amount (percent by weight) of ingredient(s) specified in the ingredient statement on the label must be stated as the nominal concentration of such ingredient(s), as that term is defined in 40 CFR 158.153(i). Accordingly, the Agency has established the nominal concentration as the only acceptable label claim for the amount of active ingredient in the product.

.II. BACKGROUND

For some time the Agency has accepted two different methods of identifying on the label what percentage is claimed for the ingredient(s) contained in a pesticide. Some applicants claimed a percentage which represented a level between the upper and the lower certified limits. This was referred to as the nominal concentration. Other applicants claimed the lower limit as the percentage of the ingredient(s) that would be expected to be present in their product at the end of the product's shelf-life. Unfortunately, this led to a great deal of confusion among the regulated industry, the regulators, and the consumers as to exactly how much of a given ingredient was in a given product. The Agency has established the nominal concentration as the only acceptable label claim for the amount of active ingredient in the product.

Current regulations require that the percentage listed in the active ingredient statement be as precise as possible reflecting good manufacturing practices 40 CFR 156.10(g)(5). The certified limits required for each active ingredient are intended to encompass any such "good manufacturing practice" variations 40 CFR 158.175(c)(3).

The upper and lower certified limits, which must be proposed in connection with a product's registration, represent the amounts of an ingredient that may legally be present 40 CFR 158.175. The lower certified limit is used as the enforceable lower limit for the product composition according to FIFRA section 12(a)(1)(C), while the nominal concentration appearing on the label would be the routinely achieved concentration used for calculation of dosages and dilutions.

The nominal concentration would in fact state the greatest degree of accuracy that is varranted with respect to actual product composition because the nominal concentration would be the amount of active ingredient typically found in the product.

It is important for registrants to note that certified limits for active ingredients are not considered to be trade secret information under FIFRA section 10(b). In this respect the certified limits will be routinely provided by EPA to States for enforcement purposes, since the nominal concentration appearing on the label may not represent the enforceable composition for purposes of section 12(a)(1)(C).

III. REQUIREMENTS

As described below under Unit V. "COMPLIANCE SCREDULE," all currently registered products as well as all applications for new registration must comply with this Notice by specifying the nominal concentration expressed as a percentage by weight as the label claim in the ingredient(s) statement and equivalence statements if applicable (e.g., elemental arsenic, metallic sinc, salt of an acid). In addition, the requirement for performing sample analyses of five or more representative samples must be fulfilled. Copies of the raw analytical data must be submitted with the nominal ingredient label claim. Further information about the analysis requirement may be found in the 40 CFR 158.170. All products are required to provide certified limits for each active, inert ingredient, impurities of toxicological significance(i.e., upper limit(s) only) and on a case by case basis as specified by EFA. These limits are to be set based on representative sampling and chemical analysis(i.e., quality control) of the product.

The format of the ingredient statement must conform to 40 CFF 156-Labeling Requirements For Pesticides and Devices.

After July 1, 1997, all posticide ingredient statements must be changed to nominal concentration.

IV. PRODUCTS THAT REQUIRE EFFICACY DATA

All pesticides are required to be efficacious. Therefore, the certified lower limits may not be lower then the minimum level to achieve efficacy. This is extremely important for products which are intended to control pests which threaten the public health, e.g., certain antimicrobial and rodenticide products. Refer to 40 CFR 158.640.

In those cases where efficacy limits have been established, the Agency will not accept certified lower limits which are below that level for the shelf life of the product.

V. COMPLIANCE SCHEDULE

As described earlier, the purpose of this Notice is to make the registration process more uniform and more manageable for both the agency and the regulated community. It is the Agency's intention to implement the requirements of this notice as smoothly as possible so as not to disrupt or delay the Agency's high priority programs, i.e., reregistration, new chemical, or fast track (FIFFA section 3(c)(3)(B). Therefore, applicants/registrants are expected to comply with the requirements of this Notice as follows:

- (1) Beginning July 1, 1991, all new product registrations submitted to the Agency are to comply with the requirements of this Notice.
- (2) Registrants having products subject to reregistration under FIFRA section 4(a) are to comply with the requirements of this Notice when specific products are called in by the Agency under Phase V of the Reregistration Program.
- (3) All other products/applications that are not subject to (1) and (2) above will have until July 1, 1997, to comply with this Notice. Such applications should note "Conversion to Nominal Concentration" on the application form. These types of amendments will not be handled as "Fast Track" applications but will be handled as routine requests.

VI. FOR FURTHER INFORMATION

Contact Tyrone Aiken for information or questions concerning this notice on (703) 557-5024.

Anne E. Lindsay, Director Registration Division (H-7505

APPENDIX E

Pesticide Reregistration Handbook

APPENDIX F

Generic Data Call-In



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

DATA CALL-IN NOTICE

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

CERTIFIED MAIL

Dear Sir or Madam:

This Notice requires you and other registrants of pesticide products containing the active ingredient identified in Attachment A of this Notice, the <u>Data Call-In Chemical Status Sheet</u>, to submit certain product specific data as noted herein to the U.S. Environmental Protection Agency (EPA, the Agency). These data are necessary to maintain the continued registration of your product(s) containing this active ingredient. Within 90 days after you receive this Notice you must respond as set forth in Section III below. Your response must state:

1. How you will comply with the requirements set forth in this Notice and its Attachments A through G; or

3. Why you believe EPA should not require your submission of product specific data in the manner specified by this Notice (see section III-D).

If you do not respond to this Notice, or if you do not satisfy EPA that you will comply with its requirements or should be exempt or excused from doing so, then the registration of your product(s) subject to this Notice will be subject to suspension. We have provided a list of all of your products subject to this Notice in Attachment B, Data Call-In Response Form, as well as a list of all registrants who were sent this Notice (Attachment F).

The authority for this Notice is section 3(c)(2)(B) of the Federal Insecticide, Fungicide and Rodenticide Act as amended (FIFRA), 7 U.S.C. section 136a(c)(2)(B). Collection of this information is authorized under the Paperwork Reduction Act by OMB Approval No. 2070-0107 (expiration date 12-31-92).

This Notice is divided into six sections and seven Attachments. The Notice itself contains information and instructions applicable to all Data Call-In Notices. The Attachments contain specific chemical information and instructions. The six sections of the Notice are:

Section I - Why You Are Receiving This Notice

Section II - Data Required By This Notice

Section III - Compliance With Requirements Of This Notice

Section IV - Consequences Of Failure To Comply With

This Notice
Section V - Registrants' Obligation To Report

Possible Unreasonable Adverse Effects
Section VI - Inquiries And Responses To This Notice

. The Attachments to this Notice are:

- A Data Call-In Chemical Status Sheet
- B Data Call-In Response Form
- C Requirements Status and Registrant's Response Form
- D EPA Grouping of End-Use Products for Meeting Acute
 Toxicology Data Requirements for Reregistration
- E EPA Acceptance Criteria
- F List of Registrants Receiving This Notice
- G Cost Share and Data Compensation Forms, and Product Specific Data Report Form

SECTION I. WHY YOU ARE RECEIVING THIS NOTICE

The Agency has reviewed existing data for this active ingredient and reevaluated the data needed to support continued registration of the subject active ingredient. The Agency has concluded that the only additional data necessary are product specific data. No additional generic data requirements are being imposed. You have been sent this Notice because you have product(s) containing the subject active ingredient.

SECTION II. DATA REQUIRED BY THIS NOTICE

II-A. DATA REQUIRED

The product specific data required by this Notice are specified in Attachment C, Requirements Status and Registrant's Response Form. Depending on the results of the studies required in this Notice, additional testing may be required.

II-B. SCHEDULE FOR SUBMISSION OF DATA

You are required to submit the data or otherwise satisfy the data requirements specified in Attachment C, Requirements Status and Registrant's Response Form, within the timeframes provided.

II-C. TESTING PROTOCOL

All studies required under this Notice must be conducted in accordance with test standards outlined in the Pesticide Assessment Guidelines for those studies for which guidelines have been established.

These EPA Guidelines are available from the National Technical Information Service (NTIS), Attn: Order Desk, 5285 Port Royal Road, Springfield, Va 22161 (tel: 703-487-4650).

Protocols approved by the Organization for Economic Cooperation and Development (OECD) are also acceptable if the OECD-recommended test standards conform to those specified in the Pesticide Data Requirements regulation (40 CFR § 158.70). When using the OECD protocols, they should be modified as appropriate so that the data generated by the study will satisfy the requirements of 40 CFR § 158. Normally, the Agency will not extend deadlines for complying with data requirements when the studies were not conducted in accordance with acceptable standards. The OECD protocols are available from OECD, 1750 Pennsylvania Avenue N.W., Washington, D.C. 20006.

All new studies and proposed protocols submitted in response to this Data Call-In Notice must be in accordance with Good Laboratory Practices [40 CFR Part 160.3(a)(6)].

II-D. REGISTRANTS RECEIVING PREVIOUS SECTION 3(c)(2)(B) NOTICES ISSUED BY THE AGENCY

Unless otherwise noted herein, this Data Call-In does not in any way supersede or change the requirements of any previous Data Call-In(s), or any other agreements entered into with the Agency pertaining to such prior Notice. Registrants must comply with the requirements of all Notices to avoid issuance of a Notice of Intent to Suspend their affected products.

SECTION III. COMPLIANCE WITH REQUIREMENTS OF THIS NOTICE

III-A. SCHEDULE FOR RESPONDING TO THE AGENCY

The appropriate responses initially required by this Notice for product specific data must be submitted to the Agency within 90 days after your receipt of this Notice. Failure to adequately respond to this Notice within 90 days of your receipt will be a basis for issuing a Notice of Intent to Suspend (NOIS) affecting

your products. This and other bases for issuance of NOIS due to failure to comply with this Notice are presented in Section IV-A and IV-B.

III-B. OPTIONS FOR RESPONDING TO THE AGENCY

The options for responding to this Notice for product specific data are: (a) voluntary cancellation, (b) agree to satisfy the product specific data requirements imposed by this Notice or (c) request a data waiver(s).

A discussion of how to respond if you choose the Voluntary Cancellation option is presented below. A discussion of the various options available for satisfying the product specific data requirements of this Notice is contained in Section III-C. A discussion of options relating to requests for data waivers is contained in Section III-D.

There are two forms that accompany this Notice of which, depending upon your response, one or both must be used in your response to the Agency. These forms are the Data-Call-In Response Form, and the Requirements Status and Registrant's Response Form, Attachment B and Attachment C. The Data Call-In Response Form must be submitted as part of every response to this Notice. In addition, one copy of the Requirements Status and Registrant's Response Form must be submitted for each product listed on the Data Call-In Response Form unless the voluntary cancellation option is selected or unless the product is identical to another (refer to the instructions for completing the Data Call-In Response Form in Attachment B). Please note that the company's authorized representative is required to sign the first page of the Data Call-In Response Form and Requirements Status and Registrant's Response Form (if this form is required) and initial any subsequent pages. The forms contain separate detailed instructions on the response options. Do not alter the printed material. If you have questions or need assistance in preparing your response, call or write the contact person(s) identified in Attachment A.

1. Voluntary Cancellation - You may avoid the requirements of this Notice by requesting voluntary cancellation of your product(s) containing the active ingredient that is the subject of this Notice. If you wish to voluntarily cancel your product, you must submit a completed <u>Data Call-In Response Form</u>, indicating your election of this option. Voluntary cancellation is item number 5 on the <u>Data Call-In Response Form</u>. If you choose this option, this is the only form that you are required to complete.

If you choose to voluntarily cancel your product, further sale and distribution of your product after the effective date of cancellation must be in accordance with the Existing Stocks provisions of this Notice which are contained in Section IV-C.

- 2. Satisfying the Product Specific Data Requirements of this Notice. There are various options available to satisfy the product specific data requirements of this Notice. These options are discussed in Section III-C of this Notice and comprise options 1 through 6 on the Requirements Status and Registrant's Response Form and item numbers 7a and 7b on the Data Call-In Response Form. Deletion of a use(s) and the low volume/minor use option are not valid options for fulfilling product specific data requirements.
- 3. Request for Product Specific Data Waivers. Waivers for product specific data are discussed in Section III-D of this Notice and are covered by option 7 on the Requirements Status and Registrant's Response Form. If you choose this option, you must submit both forms as well as any other information/data pertaining to the option chosen to address the data requirement.

III-C SATISFYING THE DATA REQUIREMENTS OF THIS NOTICE

If you acknowledge on the <u>Data Call-In Response</u> Form that you agree to satisfy the product specific data requirements (i.e. you select option 7a or 7b), then you must select one of the six options on the <u>Requirements Status and Registrant's Response</u> Form related to data production for each data requirement. Your option selection should be entered under item number 9, "Registrant Response." The six options related to data production are the first six options discussed under item 9 in the instructions for completing the <u>Requirements Status and Registrant's Response</u> Form. These six options are listed immediately below with information in parentheses to guide registrants to additional instructions provided in this Section. The options are:

- (1) I will generate and submit data within the specified timeframe (Developing Data)
- (2) I have entered into an agreement with one or more registrants to develop data jointly (Cost Sharing)
- (3) I have made offers to cost-share (Offers to Cost Share)
- (4) I am submitting an existing study that has not been submitted previously to the Agency by anyone (Submitting an Existing Study)
- (5) I am submitting or citing data to upgrade a study classified by EPA as partially acceptable and upgradeable (Upgrading a Study)
- (6) I am citing an existing study that EPA has classified as acceptable or an existing study that has been submitted but not reviewed by the Agency (Citing an Existing Study)

Option 1. Developing Data -- If you choose to develop the required data it must be in conformance with Agency deadlines and with other Agency requirements as referenced herein and in the attachments. All data generated and submitted must comply with the Good Laboratory Practice (GLP) rule (40 CFR Part 160), be conducted according to the Pesticide Assessment Guidelines (PAG), and be in conformance with the requirements of PR Notice 86-5.

The time frames in the <u>Requirements Status and Registrant's</u>
<u>Response Form</u> are the time frames that the Agency is allowing for
the submission of completed study reports. The noted deadlines run
from the date of the receipt of this Notice by the registrant. If
the data are not submitted by the deadline, each registrant is
subject to receipt of a Notice of Intent to Suspend the affected
registration(s).

If you cannot submit the data/reports to the Agency in the time required by this Notice and intend to seek additional time to meet the requirements(s), you must submit a request to the Agency Which includes: (1) a detailed description of the expected difficulty and (2) a proposed schedule including alternative dates for meeting such requirements on a step-by-step basis. You must explain any technical or laboratory difficulties and provide documentation from the laboratory performing the testing. While EPA is considering your request, the original deadline remains. The Agency will respond to your request in writing. If EPA does not grant your request, the original deadline remains. Normally, extensions can be requested only in cases of extraordinary testing problems beyond the expectation or control of the registrant. Extensions will not be given in submitting the 90-day responses. Extensions will not be considered if the request for extension is not made in a timely fashion; in no event shall an extension request be considered if it is submitted at or after the lapse of the subject deadline.

Option 2. Agree to Share in Cost to Develop Data -- Registrants may only choose this option for acute toxicity data and certain efficacy data and only if EPA has indicated in the attached data tables that your product and at least one other product are similar for purposes of depending on the same data. If this is the case, data may be generated for just one of the products in the group. The registration number of the product for which data will be submitted must be noted in the agreement to cost share by the registrant selecting this option. If you choose to enter into an agreement to share in the cost of producing the required data but will not be submitting the data yourself, you must provide the name of the registrant who will be submitting the data. You must also provide EPA with documentary evidence that an agreement has been formed. Such evidence may be your letter offering to join in an agreement and the other registrant's acceptance of your offer, or a written statement by the parties that an agreement exists. The agreement to produce the data need not specify all of the terms of the final arrangement between the parties or the mechanism to resolve the terms. Section 3(c)(2)(B) provides that if the parties cannot resolve the terms of the agreement they may resolve their differences through binding arbitration.

Option 3. Offer to Share in the Cost of Data Development -This option only applies to acute toxicity and certain efficacy
data as described in option 2 above. If you have made an offer to
pay in an attempt to enter into an agreement or amend an existing
agreement to meet the requirements of this Notice and have been

unsuccessful, you may request EPA (by selecting this option) to exercise its discretion not to suspend your registration(s), although you do not comply with the data submission requirements of this Notice. EPA has determined that as a general policy, absent other relevant considerations, it will not suspend the registration of a product of a registrant who has in good faith sought and continues to seek to enter into a joint data development/cost sharing program, but the other registrant(s) developing the data has refused to accept your offer. To qualify for this option, you must submit documentation to the Agency proving that you have made an offer to another registrant (who has an obligation to submit data) to share in the burden of developing that data. You must also submit to the Agency a completed EPA Form 8570-32, Certification of Offer to Cost Share in the Development of Data, Attachment G. In addition, you must demonstrate that the other registrant to whom the offer was made has not accepted your offer to enter into a costsharing agreement by including a copy of your offer and proof of the other registrant's receipt of that offer (such as a certified mail receipt). Your offer must, in addition to anything else, offer to share in the burden of producing the data upon terms to be agreed or failing agreement to be bound by binding arbitration as provided by FIFRA section 3(c)(2)(B)(iii) and must not qualify this offer. The other registrant must also inform EPA of its election of an option to develop and submit the data required by this Notice by submitting a Data Call-In Response Form and a Requirements Status and Registrant's Response Form committing to develop and submit the data required by this Notice.

In order for you to avoid suspension under this option, you may not withdraw your offer to share in the burdens of developing the data. In addition, the other registrant must fulfill its commitment to develop and submit the data as required by this Notice. If the other registrant fails to develop the data or for some other reason is subject to suspension, your registration as well as that of the other registrant will normally be subject to initiation of suspension proceedings, unless you commit to submit, and do submit the required data in the specified time frame. In such cases, the Agency generally will not grant a time extension for submitting the data.

Option 4. Submitting an Existing Study -- If you choose to submit an existing study in response to this Notice, you must determine that the study satisfies the requirements imposed by this Notice. You may only submit a study that has not been previously submitted to the Agency or previously cited by anyone. Existing studies are studies which predate issuance of this Notice. Do not use this option if you are submitting data to upgrade a study. (See Option 5).

You should be aware that if the Agency determines that the study is not acceptable, the Agency will require you to comply with this Notice, normally without an extension of the required date of submission. The Agency may determine at any time that a study is not valid and needs to be repeated.

To meet the requirements of the DCI Notice for submitting an existing study, all of the following three criteria must be clearly met:

- a. You must certify at the time that the existing study is submitted that the raw data and specimens from the study are available for audit and review and you must identify where they are available. This must be done in accordance with the requirements of the Good Laboratory Practice (GLP) regulation, 40 CFR Part 160. As stated in 40 CFR 160.3(j) " '[r]aw data' means any laboratory worksheets, records, · memoranda, notes, or exact copies thereof, that are the result of original observations and activities of a study and are necessary for the reconstruction and evaluation of the report of that study. In the event that exact transcripts of raw data . have been prepared (e.g., tapes which have been transcribed verbatim, dated, and verified accurate by signature), the exact copy or exact transcript may be substituted for the original source as raw data. 'Raw data' may include photographs, microfilm or microfiche copies, computer printouts, magnetic media, including dictated observations, and recorded data from automated instruments." The term "specimens", according to 40 CFR 160.3(k), means "any material derived from a test system for examination or analysis. "
 - b. Health and safety studies completed after May 1984 must also contain all GLP-required quality assurance and quality control information, pursuant to the requirements of 40 CFR Part 160. Registrants must also certify at the time of submitting the existing study that such GLP information is available for post-May 1984 studies by including an appropriate statement on or attached to the study signed by an authorized official or representative of the registrant.
 - c. You must certify that each study fulfills the acceptance criteria for the Guideline relevant to the study provided in (Hachment 2) the FIFRA Accelerated Reregistration Phase 3 Technical Guidance and that the study has been conducted according to the Pesticide Assessment Guidelines (PAG) or meets the purpose of the PAG (both available from NTIS). A study not conducted according to the PAG may be submitted to the Agency for consideration if the registrant believes that the study clearly meets the purpose of the PAG. The registrant is referred to 40 CFR 158.70 which states the Agency's policy regarding acceptable protocols. If you wish to submit the study, you must, in addition to certifying that the purposes of the PAG are met by the study, clearly articulate the rationale why you believe the study meets the purpose of the PAG, including copies of any supporting information or data. It has been the Agency's experience that studies completed prior to January 1970 rarely satisfied the purpose of the PAG and that necessary raw data are usually not available for such studies.

If you submit an existing study, you must certify that the study meets all requirements of the criteria outlined above.

If you know of a study pertaining to any requirement in this Notice which does not meet the criteria outlined above but does contain factual information regarding unreasonable adverse effects, you must notify the Agency of such a study. If such study is in the Agency's files, you need only cite it along with the notification. If not in the Agency's files, you must submit a summary and copies as required by PR Notice 86-5.

Option 5. Upgrading a Study -- If a study has been classified as partially acceptable and upgradeable, you may submit data to upgrade that study. The Agency will review the data submitted and determine if the requirement is satisfied. If the Agency decides the requirement is not satisfied, you may still be required to submit new data normally without any time extension. Deficient, but upgradeable studies will normally be classified as supplemental. However, it is important to note that not all studies classified as supplemental are upgradeable. If you have questions regarding the classification of a study or whether a study may be upgraded, call or write the contact person listed in Attachment A. If you submit data to upgrade an existing study you must satisfy or supply information to correct all deficiencies in the study identified by EPA. You must provide a clearly articulated rationale of how the deficiencies have been remedied or corrected and why the study should be rated as acceptable to EPA. Your submission must also specify the MRID number(s) of the study which you are attempting to upgrade and must be in conformance with PR Notice 86-5.

Do not submit additional data for the purpose of upgrading a study classified as unacceptable and determined by the Agency as not capable of being upgraded.

This option should also be used to cite data that has been previously submitted to upgrade a study, but has not yet been reviewed by the Agency. You must provide the MRID number of the data submission as well as the MRID number of the study being upgraded.

The criteria for submitting an existing study, as specified in Option 4 above, apply to all data submissions intended to upgrade studies. Additionally your submission of data intended to upgrade studies must be accompanied by a certification that you comply with each of those criteria as well as a certification regarding protocol compliance with Agency requirements.

Option 6. Citing Existing Studies -- If you choose to cite a study that has been previously submitted to EPA, that study must have been previously classified by EPA as acceptable or it must be a study which has not yet been reviewed by the Agency. Acceptable

toxicology studies generally will have been classified as "coreguideline" or "core minimum." For all other disciplines the classification would be "acceptable." With respect to any studies for which you wish to select this option you must provide the MRID number of the study you are citing and, if the study has been reviewed by the Agency, you must provide the Agency's classification of the study.

If you are citing a study of which you are not the original data submitter, you must submit a completed copy of EPA Form 8570-31, Certification with Respect to Data Compensation Requirements.

Registrants who select one of the above 6 options must meet all of the requirements described in the instructions for completing the Data Call-In Response Form and the Registrant's Response Form, as appropriate.

III-D REQUESTS FOR DATA WAIVERS

If you request a waiver for product specific data because you believe it is inappropriate, you must attach a complete justification for the request, including technical reasons, data and references to relevant EPA regulations, guidelines or policies. (Note: any supplemental data must be submitted in the format required by PR Notice 86-5). This will be the only opportunity to state the reasons or provide information in support of your request. If the Agency approves your waiver request, you will not be required to supply the data pursuant to section 3(c)(2)(B) of FIFRA. If the Agency denies your waiver request, you must choose an option for meeting the data requirements of this Notice within 30 days of the receipt of the Agency's decision. You must indicate and submit the option chosen on the Requirements Status and Registrant's Response Form. Product specific data requirements for product chemistry, acute toxicity and efficacy (where appropriate) are required for all products and the Agency will grant a waiver only under extraordinary circumstances. You should also be aware that submitting a waiver request will not automatically extend the due date for the study in question. Waiver requests submitted without adequate supporting rationale will be denied and the original due date will remain in force.

IV. CONSEQUENCES OF FAILURE TO COMPLY WITH THIS NOTICE

IV-A NOTICE OF INTENT TO SUSPEND

The Agency may issue a Notice of Intent to Suspend products subject to this Notice due to failure by a registrant to comply with the requirements of this Data Call-In Notice, pursuant to FIFRA section 3(c)(2)(B). Events which may be the basis for issuance of a Notice of Intent to Suspend include, but are not limited to, the following:

- 1. Failure to respond as required by this Notice within 90 days of your receipt of this Notice.
- 2. Failure to submit on the required schedule an acceptable proposed or final protocol if such is required to be submitted to the Agency for review.
- 3. Failure to submit on the required schedule an adequate progress report on a study if required by this Notice.
- 4. Failure to submit on the required schedule acceptable data as required by this Notice.
- 5. Failure to take a required action or submit adequate information pertaining to any option chosen to address the data requirements (e.g., any required action or information pertaining to submission or citation of existing studies or offers, arrangements, or arbitration on the sharing of costs or the formation of Task Forces, failure to comply with the terms of an agreement or arbitration concerning joint data development or failure to comply with any terms of a data waiver).
 - 6. Failure to submit supportable certifications as to the conditions of submitted studies, as required by Section III-C of this Notice.
 - 7. Withdrawal of an offer to share in the cost of developing required data.
- 8. Failure of the registrant to whom you have tendered an offer to share in the cost of developing data and provided proof of the registrant's receipt of such offer either to:
 - a. Inform EPA of intent to develop and submit the data required by this Notice on a <u>Data Call-In Response</u> Form and a <u>Requirements Status and Registrant's Response</u> Form;
 - b. Fulfill the commitment to develop and submit the data as required by this Notice; or
- c. Otherwise take appropriate steps to meet the requirements stated in this Notice, unless you commit to submit and do submit the required data in the specified time frame.
 - 9. Failure to take any required or appropriate steps, not mentioned above, at any time following the issuance of this Notice.

IV-B. BASIS FOR DETERMINATION THAT SUBMITTED STUDY IS UNACCEPTABLE

The Agency may determine that a study (even if submitted within the required time) is unacceptable and constitutes a basis for

issuance of a Notice of Intent to Suspend. The grounds for suspension include, but are not limited to, failure to meet any of the following:

- 1. EPA requirements specified in the Data Call-In Notice or other documents incorporated by reference (including, as applicable, EPA Pesticide Assessment Guidelines, Data Reporting Guidelines, and GeneTox Health Effects Test Guidelines) regarding the design, conduct, and reporting of required studies. Such requirements include, but are not limited to, those relating to test material, test procedures, selection of species, number of animals, sex and distribution of animals, dose and effect levels to be tested or attained, duration of test, and, as applicable, Good Laboratory Practices.
- 2. EPA requirements regarding the submission of protocols (if applicable), including the incorporation of any changes required by the Agency following review.
 - 3. EPA requirements regarding the reporting of data, including the manner of reporting, the completeness of results, and the adequacy of any required supporting (or raw) data, including, but not limited to, requirements referenced or included in this Notice or contained in PR 86-5. All studies must be submitted in the form of a final report; a preliminary report will not be considered to fulfill the submission requirement.

IV-C EXISTING STOCKS OF SUSPENDED OR CANCELLED PRODUCTS

EPA has statutory authority to permit continued sale, distribution and use of existing stocks of a pesticide product which has been suspended or cancelled if doing so would be consistent with the purposes of the Act. .

The Agency has determined that such disposition by registrants of existing stocks for a suspended registration when a section 3(c)(2)(B) data request is outstanding would generally not be consistent with the Act's purposes. Accordingly, the Agency anticipates granting registrants permission to sell, distribute, or use existing stocks of suspended product(s) only in exceptional circumstances. If you believe such disposition of existing stocks of your product(s) which may be suspended for failure to comply with this Notice should be permitted, you have the burden of clearly demonstrating to EPA that granting such permission would be consistent with the Act. You must also explain why an "existing stocks" provision is necessary, including a statement of the quantity of existing stocks and your estimate of the time required for their sale, distribution, and use. Unless you meet this burden the Agency will not consider any request pertaining to the continued sale, distribution, or use of your existing stocks after suspension.

If you request a voluntary cancellation of your product(s) as a response to this Notice and your product is in full compliance with

all Agency requirements, you will have, under most circumstances, one year from the date your 90 day response to this Notice is due, to sell, distribute, or use existing stocks. Normally, the Agency will allow persons other than the registrant such as independent distributors, retailers and end users to sell, distribute or use such existing stocks until the stocks are exhausted. Any sale, distribution or use of stocks of voluntarily cancelled products containing an active ingredient for which the Agency has particular risk concerns will be determined on a case-by-case basis.

Requests for voluntary cancellation received after the 90 day response period required by this Notice will not result in the Agency granting any additional time to sell, distribute, or use existing stocks beyond a year from the date the 90 day response was due unless you demonstrate to the Agency that you are in full compliance with all Agency requirements, including the requirements of this Notice. For example, if you decide to voluntarily cancel your registration six months before a 3 year study is scheduled to be submitted, all progress reports and other information necessary to establish that you have been conducting the study in an acceptable and good faith manner must have been submitted to the Agency, before EPA will consider granting an existing stocks provision.

SECTION V. REGISTRANTS' OBLIGATION TO REPORT POSSIBLE UNREASONABLE ADVERSE EFFECTS

Registrants are reminded that FIFRA section 6(a)(2) states that if at any time after a pesticide is registered a registrant has additional factual information regarding unreasonable adverse effects on the environment by the pesticide, the registrant shall submit the information to the Agency. Registrants must notify the Agency of any factual information they have, from whatever source, including but not limited to interim or preliminary results of studies, regarding unreasonable adverse effects on man or the environment. This requirement continues as long as the products are registered by the Agency.

SECTION VI. INOUIRIES AND RESPONSES TO THIS NOTICE

If you have any questions regarding the requirements and procedures established by this Notice, call the contact person(s) listed in Attachment A, the <u>Data Call-In Chemical Status Sheet</u>.

All responses to this Notice (other than voluntary cancellation requests) must include a completed <u>Data Call-In Response Form</u> and a completed <u>Requirements Status and Registrant's Response Form</u> (Attachment B and Attachment C) and any other documents required by this Notice, and should be submitted to the contact person(s) identified in Attachment A. If the voluntary cancellation option is chosen, only the <u>Data Call-In Response Form</u> need be submitted.

The Office of Compliance Monitoring (OCM) of the Office of Pesticides and Toxic Substances (OPTS), EPA, will be monitoring the data being generated in response to this Notice.

Sincerely yours,

Daniel M. Barolo, Director Special Review and Reregistration Division

Attachments

- A Data Call-In Chemical Status Sheet
- B Data Call-In Response Form
- C Requirements Status and Registrant's Response Form
- D EPA Grouping of End-Use Products for Meeting Acute Toxicology Data Requirements for Reregistration
- E EPA Acceptance Criteria
- F List of Registrants Receiving This Notice
- G Cost Share and Data Compensation Forms, and Product Specific Data Report Form

ATTACHMENT A CHEMICAL STATUS SHEET

ATTACHMENT A

SOAP SALTS: GENERIC DATA CALL-IN CHEMICAL STATUS SHEET

INTRODUCTION

You have been sent this Data Call-In Notice for generic data because you have products containing soap salts.

This attachment, the Data Call-in Chemical Status Sheet, contains a point of contact for inquiries. This attachment is to be used in conjunction with (1) the Data Call-In Notice, (2) Attachment B, the Data Call-In Response Form, (3) Attachment C, the Requirement Status and Registrant's Response Form for generic data, (4) Attachment D. List of All. Registrants Sent this Data Call-in Notice, (5) Attachment E, EPA Acceptance Criteria, (6) Attachment F, Cost Share and Data Compensation Forms for generic data, and Generic Data Report Form for use in replying to this soap salts Data Call-In. Instructions and guidance accompany each form.

DATA REQUIRED BY THIS NOTICE

The additional data requirements needed to complete the database for soap salts are listed in the Requirements Status and Registrant's Response Form, Attachment C.

The Agency has concluded that generic data are needed for soap salts. The required additional data are listed in Attachment C.

Depending on the results of the studies required in this Notice, additional testing may be required.

INOUIRIES AND RESPONSES TO THIS NOTICE

If you have any questions regarding the generic data requirements and procedures established by this Notice, please contact Veronica Dutch (703) 305-8585. All responses to this Notice should be submitted to:

> Chemical Review Manager Veronica Dutch Accelerated Reregistration Branch (H7508W) Special Review and Reregistration Division Office of Pesticide Programs U.S. Environmental Protection Agency 401 M Street S.W. Washington, D.C. 20460 RE: Soap salts

ATTACHMENT B

GENERIC DATA CALL-IN RESPONSE FORMS (Form A) PLUS INSTRUCTIONS

SPECIFIC INSTRUCTIONS FOR THE DATA CALL-IN RESPONSE FORM

This form is designed to be used to respond to call-ins for generic and product specific data for the purpose of reregistering pesticides under the Federal Insecticide Fungicide and Rodenticide Act. Fill out this form each time you are responding to a data call-in for which EPA has sent you the form entitled "Requirements Status and Registrant's Response."

Items 1 -4 will have been preprinted on the form. Items 5 through 7 must be completed by the registrant as appropriate. Items 8 through 11 must be completed by the registrant before submitting a response to the Agency.

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggesting for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Management and Budget, Paperwork Reduction Project 2070-0107, Washington, D.C. 20503.

INSTRUCTIONS

- Item 1. This item identifies your company name, number and address.
- Item 2. This item identifies the case number, case name, EPA chemical number and chemical name.
- Item 3. This item identifies the date and type of data call-in.
- Item 4. This item identifies the EPA product registrations relevant to the data call-in. Please note that you are also responsible for informing the Agency of your response regarding any product that you believe may be covered by this data call-in but that is not listed by the Agency in Item 4. You must bring any such apparent omission to the Agency's attention within the period required for submission of this response form.
- Item 5. Check this item for each product registration you wish to cancel voluntarily. If a registration number is listed for a product for which you previously requested voluntary cancellation, indicate in Item 5 the date of that request. You do not need to complete any item on

person signing must include his/her title. Additional pages used in your response must be initialled and dated in the space provided for the certification.

- Item 9. Enter the date of signature.
- Item 10. Enter the name of the person EPA should contact with questions regarding your response.
- Item 11. Enter the phone number of your company contact.

United States Environmental Protection Agency Washington, D.C. 20460 DATA CALL-IN RESPONSE Form Approved

ONB No. 2070-0107 Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.

Use additional sheet(s) if necessary			,		
1. Company name and Address 053219 MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA, 92121	219	2. Case # and Name 4083 SOAP SAITS Chemical # and Name 079021 Potassium salts of fatty acids		3. Date and Type of DCI GENERIC	Type of DCI
*	6. Generic Data		7. Product Specific Data	ata	
registration cancet this product registration voluntarily	6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	ic 6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and ow. Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements status and Registrant's Response."	P and Buy Buched ents	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
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53219-6					

B. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment	his form and all attachments or misleading statement may	s are true, accurate, and complete. be punishable by fine, imprisonment	9. Date	ate	
Signature and Title of Company's Authorized Representative	ized Representative				
10. Name of Company Contact				11. Phone Number	:

United States Environmental Protection Agency Washington, D.C. 20460 DATA CALL-IN RESPONSE CMB No. 2070-0107 Form Approved Approval Expires 12-31-92

10. Name of Company Contact Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. 400-383 4. EPA Product Registration 1. Company name and Address 000400 UNIROYAL CHEMICAL CO INC Use additional sheet(s) if necessary 8. Certification 400-429 INSTRUCTIONS: Please type or print in ink. BETHANY CT, 06524 74 AMITY RD 5. I wish to cancel this product registration volun-6a. I am claiming a Generic Data Exemption because I obtain the active ingredient 6. Generic Data tration number listed below from the source EPA regis-Please read carefully the attached instructions and supply the information requested on this form Case # and Name Chemicat # and Name 031801 4083 Ammonium Salts of Fatty Acids on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic Data requirements as indicated Soap salts requirements on the attached form entitled "Requirements 7. Product Specific Data 7a. My product is an MUP and 1 agree to satisfy the MUP Status and Registrant's Response." 9. Date 11. Phone Number Date and Type of DCI GENERIC Status and Registrant's requirements on the attached form entitled "Requirements Response." 7b. My product is an EUP and I agree to satisfy the EUP

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	9. Date	••	rue, accurate, and complete. sishable by fine, imprisonment	8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative	atements made on th ny knowingly false o ble law. of Company's Authori	8. Certification I certify that the statements made on this form and all at I certify that the statements made on this form and all at I acknowledge that any knowingly false or misleading state or both under applicable law. Signature and fittle of Company's Authorized Representative
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**	11. Phone Number	31			Contact	10. Name of Company Contact
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7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	n MAP and the MAP attached irements nt's	7a. Hy product is an HLP and I agree to satisfy the HLP requirements on the attached form entitled "Requirements Status and Registrant's Response."	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	6s. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	cancel this product registration voluntarily	Registration
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Form Approved ONB No. 2070-0107			D.C. 20460	Washington,	Unicea	
Page 1 of 1						

Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. 42697-35 42697-34 Use additional sheet(s) if necessary 8. Certification NC83001100 42697-33 42697-22 42697-11 42697-10 42697-6 42697-2 42697-1 Registration 4. EPA Product 1. Company name and Address INSTRUCTIONS: Please type or print in ink. 42697-16 42697-15 42697-13 42697-7 10. Name of Company Contact 1414 FENWICK IN AGENT FOR: SAFER DELTA ANALYTICAL SILVER SPRINGS MD 5. I wish to cancel this product registration voluntarily 042697 CORP INC United States Environmental Protection Agency 20910 68. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis-6. Generic Data tration number listed below. Please read carefully the attached instructions and supply the information requested on this form. Washington, DATA CALL-IN RESPONSE Ņ Case # and Name Chemical # and Name 079021 4083 Potassium salts of fatty acids D.C. 6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 20460 Soap salts requirements on the attached form entitled "Requirements Status and Registrant's Response.* 7a. My product is an MUP at I agree to satisfy the MUP 7. Product Specific Data 9. Date 11. Phone Number 8 Date and Type of DCI GENERIC requirements on the attached form entitled "Requirements Status and Registrant's Response.* I agree to satisfy the EUP 7b. My product is an EUP and DMB No. 2070-0107 Form Approved Approval Expires 12-31-92

ATTACHMENT C .

GENERIC REQUIREMENT STATUS AND REGISTRANT'S RESPONSE (Form B) PLUS INSTRUCTIONS

SPECIFIC INSTRUCTIONS FOR COMPLETING THE REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE FORM

Generic Data

This form is designed to be used for registrants to respond to call-ins for generic and product-specific data as part of EPA's reregistration program under the Federal Insecticide Fungicide and Rodenticide Act. Although the <u>form</u> is the same for both product specific and generic data, <u>instructions</u> for completing the forms differ slightly. Specifically, options for satisfying product specific data requirements do not include (1) deletion of uses or (2) request for a low volume/minor use waiver. These instructions are for completion of <u>generic data</u> requirements.

EPA has developed this form individually for each data callin addressed to each registrant, and has preprinted this form with a number of items. <u>DO NOT</u> use this form for any other active ingredient.

Items 1 through 8 (inclusive) will have been preprinted on the form. You must complete all other items on this form by typing or printing legibly.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggesting for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Management and Budget, Paperwork Reduction Project 2070-0107, Washington, D.C. 20503.

INSTRUCTIONS

- Item 1. This item identifies your company name, number, and address.
- Item 2. This item identifies the case number, case name, EPA chemical number and chemical name.
- Item 3. This item identifies the date and type of data call-in.
- Item 4. This item identifies the guideline reference numbers of studies required to support the product(s) being reregistered. These guidelines, in addition to requirements specified in the Data Call-In Notice, govern the conduct of the required studies.
- This item identifies the study title associated with the guideline reference number and whether protocols and 1, 2, or 3-year progress reports are required to be submitted in connection with the study. As noted in Section III of the Data Call-In Notice, 90-day progress reports are required for all studies.

If an asterisk appears in Item 5, EPA has attached information relevant to this guideline reference number to the Requirements Status and Registrant's Response Form.

Item 6. This item identifies the code associated with the use pattern of the pesticide. A brief description of each code follows:

λ	Terrestrial food
B	Terrestrial feed
C	Terrestrial non-food
D	Aquatic food
E · ·	Aquatic non-food outdoor
F	Aquatic non-food industrial
·G	Aquatic non-food residential
H ,	Greenhouse food
I	Greenhouse non-food crop
J	Forestry
K	Residential
L	Indoor food
M ·	Indoor non-food
N	Indoor medical
0	Indoor residential

Item 7. .This item identifies the code assigned to the substance that must be used for testing. A brief description of each code follows:

End-Use Product

Manufacturing-Use Product Manufacturing-Use Product and Technical MP/TGAI Grade Active Ingredient PAI Pure Active Ingredient PAI/M Pure Active Ingredient and Metabolites Pure Active Ingredient or Pure Active PAI/PAIRA Ingredient Radiolabelled PAIRA Pure Active Ingredient Radiolabelled Pure Active Ingredient Radiolabelled and PAIRA/M Metabolites PAIRA/PM Pure Active Ingredient Radiolabelled and Plant Metabolites TEP Typical End-Use Product , TEP Typical End-Use Product, Percent Active

Ingredient Specified TEP/MET Typical End-Use Product and Metabolites TEP/PAI/M Typical End-Use Product or Pure Active

Ingredient and Metabolites

Technical Grade Active Ingredient TGAI Technical Grade Active Ingredient or TGAI/PAI

Pure Active Ingredient

Technical Grade Active Ingredient or TGAI/PAIRA Pure Active Ingredient Radiolabelled Technical Grade Active Ingredient or TGAI/TEP

Typical End-Use Product

MET Metabolites IMP Impurities DEGR Degradates

EP

MP

See: quideline comment

- · Item 8. This item identifies the time frame allowed for submission of the study or protocol identified in item 2. The time frame runs from the date of your receipt of the Data Call-In Notice.
 - Item 9. Enter the appropriate Response Code or Codes to show how you intend to comply with each data requirement. Brief descriptions of each code follow. The Data Call-In Notice contains a fuller description of each of these options.
 - .(Developing Data) I will conduct a new study and submit it within the time frames specified in item 8 above. By indicating that I have chosen this option, I certify that I will comply with all the

requirements pertaining to the conditions for submittal of this study as outlined in the Data Call-In Notice and that I will provide the protocols and progress reports required in item 5 above.

- 2. (Agreement to Cost Share) I have entered into an agreement with one or more registrants to develop data jointly. By indicating that I have chosen this option, I certify that I will comply with all the requirements pertaining to sharing in the cost of developing data as outlined in the Data Call-In Notice.
- 3. (Offer to Cost Share) I have made an offer to enter into an agreement with one or more registrants to develop data jointly. I am submitting a copy of the form "Certification of Offer to Cost Share in the Development of Data" that describes this offer/agreement. By indicating that I have chosen this option, I certify that I will comply with all the requirements pertaining to making an offer to share in the cost of developing data as outlined in the Data Call-In Notice.
- 4. (Submitting Existing Data) I am submitting an existing study that has never before been submitted to EPA. By indicating that I have chosen this option, I certify that this study meets all the requirements pertaining to the conditions for submittal of existing data outlined in the Data Call-In Notice and I have attached the needed supporting information along with this response.
- 5. (Upgrading a Study) I am submitting or citing data to upgrade a study that EPA has classified as partially acceptable and potentially upgradeable. By indicating that I have chosen this option, I certify that I have met all the requirements pertaining to the conditions for submitting or citing existing data to upgrade a study described in the Data Call-In Notice. I am indicating on attached correspondence the Master Record Identification Number (MRID) that EPA has assigned to the data that I am citing as well as the MRID of the study I am attempting to upgrade.
- 6. (Citing a Study) I am citing an existing study that has been previously classified by EPA as acceptable, core, core minimum, or a study that

has not yet been reviewed by the Agency. I am providing the Agency's classification of the study.

- 7. (Deleting Uses) I am attaching an application for amendment to my registration deleting the uses for which the data are required.
- 8. (Low Volume/Minor Use Waiver Request) I have read the statements concerning low volume-minor use data waivers in the Data Call-In Notice and I request a low-volume minor use waiver of the data requirement. I am attaching a detailed justification to support this waiver request including, among other things, all information required to support the request. I understand that, unless modified by the Agency in writing, the data requirement as stated in the Notice governs.
- 9. (Request for Waiver of Data) I have read the statements concerning data waivers other than low-volume minor-use data waivers in the Data Call-In Notice and I request a waiver of the data requirement. I am attaching an identification of the basis for this waiver and a detailed justification to support this waiver request. The justification includes, among other things, all information required to support the request. I understand that, unless modified by the Agency in writing, the data requirement as stated in the Notice governs.
- Item 10. This item must be signed by an authorized representative of your company. The person signing must include his/her title, and must initial and date all other pages of this form.
- Item 11. Enter the date of signature.
- Item 12. Enter the name of the person EPA should contact with questions regarding your response.
- Item 13. Enter the phone number of your company contact.

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	United States Envir	Environmental		Protection Agency	Y		Form Approved
	Washington,		D.C.	20460			CHB No. 2070-0107
	REQUIRENENTS STATUS AND		BIB	REGISTRANT'S RESPONSE		:	Approval Expires 12-31-92
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*	Directions for use			ACH		8 mos.	
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Signature and little of C	Signature and little of Company's Authorized Representative						
12. Name of Company Contact	act					13. Phone Number	

United States Environmental Protection Agency
Washington, D.C. 20460

* COMMENTS FOR GUIDELINE REQUIREMENTS

Case # and Name
4083 Soap salts
Chemical # and Name

079021 Potassium salts of fatty acids

GUIDELINE COMMENT

141-1 This study is required to determine appropriate patterns will result in contact to honey bees. label precautions because the use

171-3 Amended product labels are required to include maximum rates for all uses.

	3. Phone Number	13.					12. Wame of Company Contact	77.
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* COMMENTS FOR GUIDELINE REQUIREMENTS

Case # and Name
4083 Soap salts
Chemical # and Name
079021 Potassium salts of fatty acids

GUIDELINE

COMMENT

141-1 This study is required to determine appropriate label precautions because the use patterns will result in contact to honey bees.

171-3 Amended product labels are required to include maximum rates for all uses.

Page 1 of 1

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Page 1 of 1					;			

United States Environmental Protection Agency Washington, D.C. 20460

* COMMENTS FOR GUIDELINE REQUIREMENTS

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Page 1 of 1				1				

United States Environmental Protection Agency Washington, D.C. 20460

* COMMENTS FOR GUIDELINE REQUIREMENTS

Case # and Name 4083 Soap salts

Chemical # and Name

079021 Potassium salts of fatty acids

GUIDEL INE COMMENT

141-1 This study is required to determine appropriate patterns will result in contact to honey bees. label precautions because the use

171-3 Amended product labels are required to include maximum rates for all uses.

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	11. Date	11.	curate, and complete. by fine, imprisorment	s are true, aci be punishable	achment ment may	10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisorment or both under applicable law. Signature and little of Company's Authorized Representative	10. Certification I certify that the I acknowledge that or both under appl Signature and litt
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Type of DCI	3. Date and Type of DCI GENERIC	·	Case # and Name 4083 SOAD SAITS Chemical # and Name 079021 Potassium salts of fatty acids	2. Case # and Name 4083 Soap s Chemical # and Name Potassium salts of t		name and Address 036488 ANALYTICAL CORP FOR: ATTACK PESTICIDES FENWICK LN R SPRINGS MD 20910	1. Company name and Address DELTA ANALYTIC AGENT FOR: ATT 1414 FENWICK LI SILVER SPRINGS
	on this form.	information requested on this form.	Please read carefully the attached instructions and supply the	the attached i	efully	INSTRUCTIONS: Please type or print in ink. Please read car- Use additional sheet(s) if necessary	INSTRUCTIONS: Ple
Approval Expires 12-31-92			REGISTRANT'S RESPONSE	AND REGIS	K SaJ	REQUIREMENTS STATUS	
Form Approved ONB No. 2070-0107			Protection Agency 20460	Washington, D.C.	ngto	Uniced Scaces Envisor	
* * * * * * * * * * * * * * * * * * *		7) and	- 1	2.	204043	

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ashington, D.C.	Environmental
20460	Protection
	Agency

· COMMENTS FOR GUIDELINE REQUIREMENTS

079021	Chemical	4083	Case # and Name
l Potassi	Chemical # and Wame	Soap salts	A Name
Potassium salts of fatty		Ø	
of fatty			
200			

GUIDEL INE COMMENT

- 141-1 This study is required to determine appropriate patterns will result in contact to honey bees. label precautions because the use
- 171-3 Amended product labels are required to include maximum rates for all uses.

ATTACHMENT D LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

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				Zip	94804 20910 20910 92121	
	су	NOTICE		city & State	SAN DIEGO CA SAN DIEGO CA	
	al Protection Agency C. 20460	THIS DATA CALL-IN	83 Soap salts	Address	940 HENSLEY STREET 1414 FEMULCK LN 1414 FEMULCK LN 5451 OBERLIN DR.	
	United States Environmental Washington, D. C	ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE	Case # and Name: 4083	Additional Name	REGISTRATION & REGULATORY AFFAIRS AGENT FOR: SAFER INC AGENT FOR: SAFER INC	
	· Unit	LIST OF		Company Name	CHEVRON CHEMICAL COMPANY DELTA AMALYTICAL CORP MYCOGEN CORPORATION	
				Co. Nr. C	000239 C 036488 D 042697 D 053219 W	

ATTACHMENT E EPA ACCEPTANCE CRITERIA

SUBDIVISION D

<u>Guideline</u>	Study Title
Series 61 Series 62 Series 63	Product Identity and Composition Analysis and Certification of Product Ingredients Physical and Chemical Characteristics

61 Product Identity and Composition

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1.	Name of technical material tested (include product name and
	trade name, if appropriate)
	Name, nominal concentration, and certified limits (upper and
	lower) for each active ingredient and each intentionally-
	added inert ingredient
3	Name and upper certified limit for each impurity or each
	group of impurities present at ≥ 0.1% by weight and for
	certain toxicologically significant impurities (e.g.,
	dioxins, nitrosamines) present at <0.1%
4	Purpose of each active ingredient and each intentionally- added inert
	Chemical name from Chemical Abstracts index of Nomenclature
·—	and Chemical Abstracts Service (CAS) Registry Number for each
	active ingredient and, if available, for each intentionally-
	added inert
6.	Molecular, structural, and empirical formulas, molecular
	weight or weight range, and any company assigned experimental
	or internal code numbers for each active ingredient
	Description of each beginning material in the manufacturing
	process
	EPA Registration Number if registered; for other
	beginning materials, the following:
	Name and address of manufacturer or supplier Brand name, trade name or commercial designation Technical specifications or data sheets by which
	Tochnical enecifications or data shorts by which
	manufacturer or supplier describes composition,
	properties or toxicity
8.	Description of manufacturing process
	Statement of whether batch or continuous process
	Relative amounts of beginning materials and order in
	which they are added
	Description of equipment Description of physical conditions (temperature,
	Description of physical conditions (temperature,
	pressure, humidity) controlled in each step and the
	parameters that are maintained
	Statement of whether process involves intended chemical reactions
	reactions

8. (c	ontinued)
	Flow chart with chemical equations for each intended chemical reaction Duration of each step of process Description of purification procedures Description of measures taken to assure quality of final product
9	Discussion of formation of impurities based on established chemical theory addressing (1) each impurity which may be present at \geq 0.1% or was found at \geq 0.1% by product analyses and (2) certain toxicologically significant impurities (see #3)

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61 Product Identity and Composition

GUIDANCE FOR SUMMARIZING STUDIES

The following criteria apply to the technical grade of the active ingredient being reregistered. Items 1, 2, 3, and 5 can be satisfied for most registered products by submission of the Certified Statement of Formula Ingredients Page (EPA Form 8570-4). Items 7 and 8 can be satisfied for most technical grade active ingredients (TGAIs) by submission of a flow chart with chemical equations for each intended chemical reaction. The flow chart should include complete chemical structures and names for each reactant and product of all the reactions.

- 1. Name of technical material (include product name and trade name, if appropriate).
- Description of each active and intentionally-added inert ingredient, including name, concentration, and certified limits.
- 3. Name and upper limit for all impurities present at \geq 0.1% and those toxicologically significant impurities present at <0.1%.
- 4. The purpose of each active and intentionally-added inert ingredient.
- 5. Chemical name and Registry Number for each active and intentionally-added inert ingredient (if available).
- Molecular, structural, and empirical formulas, molecular weight, and any experimental or internal code number for each active ingredient.
- 7. Description of each beginning material in the manufacturing process.
- 8. Description of manufacturing process.
- 9. Discussion of formation of impurities based on established chemical theory.

62 Analysis and Certification of Product Ingredients

ACCEPTANCE CRITERIA

The following criteria apply to the technical grade of the active ingredient being reregistered. Use a table to present the information in items 6, 7, and 8.

Does your study meet the following acceptance criteria?

1	
	batch process) analyzed for each active ingredient and all
	impurities present at ≥ 0.1%
2	Degree of accountability or closure > ca 98%
3.—	Analyses conducted for certain trace toxic impurities at
_	lower than 0.1% (examples, nitrosamines in the case of
	products containing dinitroanilines or containing secondary
	or tertiary amines/alkanolamines plus nitrites;
	polyhalogenated dibenzodioxins and dibenzofurans) [Note
	that in the case of nitrosamines both fresh and stored
	samples must be analyzed.]
4.	Complete and detailed description of each step in analytical
	method used to analyze above samples
5.	Statement of precision and accuracy of analytical method
	used to analyze above samples
6.	Identities and quantities (including mean and standard
_	deviation) provided for each analyzed ingredient
7	Upper and lower certified limits proposed for each active
	ingredient and intentionally added inert along with
	explanation of how the limits were determined
8.	Upper certified limit proposed for each impurity present at
	> 0.1% and for certain toxicologically significant
	impurities at <0.1% along with explanation of how limit
	determined
9.	Analytical methods to verify certified limits of each
	active ingredient and impurities (latter not required if
	exempt from requirement of tolerance or if generally
	recognized as safe by FDA) are fully described
10.	Analytical methods (as discussed in #9) to verify certified
	limits validated as to their precision and accuracy

62 Analysis and Certification of Product Ingredients

GUIDANCE FOR SUMMARIZING STUDIES

The following criteria apply to the technical grade of the active ingredient being reregistered.

- 1. Number of representative samples analyzed for all active ingredients and all impurities at \geq 0.1%.
- 2. Degree of accountability or closure in analyses in item #1.
- 3. Chemical names of toxic impurities which were analyzed for levels <0.1%.
- 4. Brief description(s) of analytical method(s) used to measure active ingredients and impurities in items #1 and #3.
- 5. Statement of precision and accuracy of method(s) in item #4.
- 6. Chemical name and quantities observed (range, mean, standard deviation) for each ingredient (actives and impurities) analyzed in item #1.
- 7. Proposed upper and lower certified limits for each active ingredient and intentionally added inert with brief explanation of how limits were determined.
- 8. Proposed upper certified limit for each impurity present at >=0.1% and certain toxicologically significant impurities at <0.1% with brief explanation of how limits were determined.
- 9. Brief description of analytical method(s) used to verify certified limits (if same methods as item #4, may reference latter).
- 10. Statement of precision and accuracy of method(s) in item #9 (may reference item #5 if applicable).

63 Physical and Chemical Characteristics

ACCEPTANCE CRITERIA

The following criteria apply to the technical grade of the active ingredient being reregistered.

Does your study meet the following acceptance criteria? 63-2 Color Verbal description of coloration (or lack of it) Any intentional coloration also reported in terms of Munsell color system 63-3 Physical State Verbal description of physical state provided using terms such as "solid, granular, volatile liquid" Based on visual inspection at about 20-25° C 63-4 Odor Verbal description of odor (or lack of it) using terms such as "garlic-like, characteristic of aromatic compounds" Observed at room temperature 63-5 Melting Point _ Reported in C° Any observed decomposition reported 63-6 Boiling Point Reported in C° Pressure under which B.P. measured reported Any observed decomposition reported 63-7 Density, Bulk Density, Specific Gravity
____ Measured at about 20-25° C __ Density of technical grade active ingredient reported in g/ml or the specific gravity of liquids reported with reference to water at 20° C. [Note: Bulk density of registered products may be reported in lbs/ft' or lbs/gallon.]

63-8	Solubility
	Determined in distilled water and representative polar and non-polar solvents, including those used in formulations and analytical methods for the pesticide Measured at about 20-25° C
	Measured at about 20-25° C Reported in g/100 ml (other units like ppm acceptable if sparingly soluble)
63-9	Vapor Pressure
	Measured at 25° C (or calculated by extrapolation from measurements made at higher temperature if pressure too low to measure at 25° C)
	Experimental procedure described Reported in mm Hg (torr) or other conventional units
	Dissociation Constant
	Experimental method described
	Experimental method described Temperature of measurement specified (preferably about 20 - 25° C)
63-11	Octanol/water Partition Coefficient
_	Measured at about 20-25° C
	Measured at about 20-25° C Experimentally determined and description of procedure provided (preferred method-45 Fed. Register 77350)
	Data supporting reported value provided
63-12	Hq
	Measured at about 20 - 25° C
	Measured at about 20 - 25° C Measured following dilution or dispersion in distilled water
63-13	Stability
	Sensitivity to metal ions and metal determined
	Sensitivity to metal ions and metal determined Stability at normal and elevated temperatures Sensitivity to sunlight determined

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63 Physical and Chemical Characteristics

GUIDANCE FOR SUMMARIZING STUDIES

The following criteria apply to the technical grade of the active ingredient being reregistered.

- 1. Description of color.
- 2. Description of physical state.
- 3. Description of odor.

- Indication of melting point (in C°).
 Indication of boiling point (in C°).
 Indication of density, bulk density, and specific gravity.
- 7. Indication of solubility.
- 8. Indication of vapor pressure.
- 9. Indication of dissociation constant.
- 10. Indication of octanol/water partition coefficient.
- 11. Indication of PH.
- 12. Description of stability.

SUBDIVISION F

<u>Guideline</u>	Study Title
81-1	Acute Oral Toxicity in the Rat
81-2	Acute Dermal Toxicity in the Rat, Rabbit or Guinea Pig
81-3	Acute Inhalation Toxicity in the Rat
81-4	Primary Eye Irritation in the Rabbit
81-5	Primary Dermal Irritation Study
81-6	Dermal Sensitization in the Guinea Pig
81-7	Acute Neurotoxicity in the Hen

81-1 Acute Oral Toxicity in the Rat

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1	Identily material tested (technical, end-use product, etc)
2	At least 5 young adult rats/sex/group
3	Dosing, single oral may be administered over 24 hrs.
4. <u>*</u>	Vehicle control if other than water.
5	Doses tested, sufficient to determine a toxicity category
\	or a limit dose (5000 mg/kg).
6.	Individual observations at least once a day.
7.	Observation period to last at least 14 days, or until all
	test animals appear normal whichever is longer.
8.	Individual daily observations.
9.	Individual body weights.
Lo. —	Gross necropsy on all animals.

Criteria marked with a * are supplemental and may not be required for every study.

81-1 Acute Oral Toxicity in the Rat

GUIDANCE FOR SUMMARIZING STUDIES

- 1. The form of pesticide tested, e.g. solid, liquid, percent AI in technical, end-use product, etc.
- 2. The number of animals/dose/sex tested.
- 3. Dosing route and regimen.
- 4. Vehicle used
- 5. Doses tested and results
- 6. Individual observations on day of dosing and for at least 14 days.
- 7. Summarization of body weights
- 8. Summarization of gross necropsy
- 9. Significance of changes from the Acceptance Criteria

81-2 Acute Dermal toxicity in the Rat, Rabbit or Guinea Pig

ACCEPTANCE CRITERIA

Doe	s your study meet the following acceptance criteria?
1.	Identify material tested (technical, end-use product, etc)
2.	
3.	
4.	450 gm. Dosing, single dermal.
5.	Dosing duration at least 24 hours.
	Vehicle control, only if toxicity of vehicle is unknown.
7.	
	or a limit dose (2000 mg/kg).
8.	
	before dosing
9.	
10.	
	to retain test material and to prevent ingestion.
11.	Individual observations at least once a day.
12.	Observation period to last at least 14 days.
13.	
14.	Gross necropsy on all animals.

Criteria marked with a * are supplemental and may not be required for every study.

81-2 Acute Dermal Toxicity in the Rat, Rabbit or Guinea Pig

GUIDANCE FOR SUMMARIZING STUDIES

- 1. The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc. 2. The number of animals/sex/dose
- 3. Weight range of animals
- 4. Verification of single, dermal exposure
- 5. Duration of dermal exposure
- 6. Statement of vehicle control
- 7. Doses tested and results
- 8. Preparation of application site
- 9. Area of application site (percent body surface)
- 10. Occlusion of test material on application site
- 11. Individual observations on day of dosing and for at least 14 days or until all animals appear normal (whichever is longer).
- 12. Summarization of body weights
- 13. Summarization of gross necropsy
- 14. Significance of changes from Acceptance Criteria

81-3 Acute Inhalation Toxicity in the Rat

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1	Identify material tested (technical, end-use product, etc)
2.	Product is a gas, a solid which may produce a significant
	vapor hazard based on toxicity and expected use or contains
	particles of inhalable size for man (aerodynamic diameter
	15 um or less).
3	_
4	Dosing, at least 4 hours by inhalation.
5.	Chamber air flow dynamic, at least 10 air changes/hour, at
-	least 19% oxygen content.
•	Chamber temperature, 22° C (\pm 2), relative humidity 40-60%.
ş·—	White temperature, 22° C (±2), relative number to 40° 50°.
	Monitor rate of air flow
*	Monitor actual concentrations of test material in breathing
_	zone.
	Monitor aerodynamic particle size for aerosols.
10	
	or a limit dose (5 mg/L actual concentration of respirable
	substance).
11.	Individual observations at least once a day.
12.	
13.	
14.—	Gross necropsy on all animals.

81-3 Acute Inhalation Toxicity in the Rat

GUIDANCE FOR SUMMARIZING STUDIES

- The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc.
- 2. Statement of the inhalability of test substance
- 3. The number of animals/sex/dose
- 4. Duration of inhalation exposure
- 5. Number of chamber air changes/hour and the percent oxygen content of chamber air
- 6. Ranges for chamber air temperature and relative humidity
- 7. Air flow rate
- 8. Analytical concentrations of test material in breathing zone
- 9. Results of aerosol particle-size determination
- 10. Doses tested (or limit dose of 5mg/L or highest attainable)
- 11. Individual observations on day of dosing and for at least 14 days.
- 12. Summarization of body weights
- 13. Summarization of gross necropsy
- 14. Significance of changes from Acceptance Criteria

81-4 Primary Eye Irritation in the Rabbit

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1	Identify material tested (technical, end-use product, etc)
2	Study not required if material is corrosive, causes severe
	dermal irritation or has a pH of ≤ 2 or ≥ 11.5 .
3	6 adult rabbits
4	Dosing, instillation into the conjunctival sac of one eye
	per animal.
5	Dose, 0.1 ml if a liquid; 0.1 ml or not more than 100 mg if
	a solid, paste or particulate substance.
6	Solid or granular test material ground to a fine dust.
7	Eyes not washed for at least 24 hours.
8	Eyes examined and graded for irritation before dosing and
	at 1, 24, 48 and 72 hr, then daily until eyes are normal or
	21 days (whichever is shorter).
9. <u>*</u> _	individual daily observations.
	₹

Criteria marked with a * are supplemental and may not be required for every study.

81-4 Primary Eye Irritation in the Rabbit

GUIDANCE FOR SUMMARIZING STUDIES

- 1. The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc.
- 2. State if material is corrosive, cause severe dermal irritation or has a pH of <2 or >11.5
- 3. Number of adult rabbits tested
- 4. State method of dosing, i.e., instillation into the conjunctival sac of one eye per animal
- 5. Dose administered
- 6. Note whether solid or granular test material has been ground to a fine dust
- 7. State whether eyes were washed and at what time post instillation (not less than 24 hours)
- 8. State whether eyes were examined and graded for irritation before dosing and at what periods after dosing
- 9. Individual daily observations afterwards, until eyes are normal or for 21 days
- 10. Significance of changes from Acceptance Criteria

81-5 Primary Dermal Irritation Study

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1	_ Identify material tested (technical, end-use product, etc)
2.	Study not required if material is corrosive or has a
	pH of <2 or ≥ 11.5.
3.	6 adult animals.
4.	Dosing, single dermal.
5.	Dosing duration 4 hours.
6.	Application site shaved or clipped at least 24 hours prior
	to dosing
7	Application site approximately 6 cm.
8.	Application site covered with a gauze patch held in place
	with nonirritating tape
9.	Material removed, washed with water, without trauma to
	application site
10.	Application site examined and graded for irritation at 1,
	24, 48 and 72 hr, then daily until normal or 14 days
	(whichever is shorter).
11. <u>*</u>	Individual daily observations.

Criteria marked with a * are supplemental and may not be required for every study.

81-5 Primary Dermal Irritation Study

GUIDANCE FOR SUMMARIZING STUDIES

- The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc.
- State if material is corrosive, has a pH <2 or >11.5, or has a dermal LD 50 <200 mg/kg
- 3. Number of adult animals tested
- 4. Amount applied
- 5. Duration of dermal exposure
- 6. Preparation of application site (shaved or clipped at specified time before dosing)
- 7. Area of application site
- 8. Method for occlusion of application site
- 9. Note removal of test material and if skin was washed with water
- 10. State times post application when site was graded for irritation
- 11. Individual observations for day of dosing and individual daily observations thereafter
- 12. Significance of changes from Acceptance Criteria.

81-6 Dermal Sensitization in the Guinea Pig

ACCEPTANCE CRITERIA

dose your study meet the following acceptance criteria?

1	Identify material tested (technical, end-use product, etc)
2	Study not required if material is corrosive or has a
	pH of ≤ 2 or ≥ 11.5 .
3	One of the following methods is utilized;
	Freund's complete adjuvant test
	Guinea pig maximization test
	Split adjuvant technique
	Buehler test
	Open epicutaneous test
	Mauer optimization test
	Footpad technique in guinea pig
4.	Complete description of test
5. <u>*</u>	Reference for test.
6.	Test followed essentially as described in reference
	document.
7.	Positive control included (may provide historical data
	conducted within the last 6 months)

Criteria marked with a * are supplemental and may not be required for every study.

81-6 Dermal Sensitization in the Guinea Pig

GUIDANCE FOR SUMMARIZING STUDIES

- The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc.
- 2. State if material is corrosive or has pH <2 or >11.5.
- 3. State specific method utilized
- 4. Complete description of specific method
- Reference for the specific method employed
 Note adherence of the protocol to that in the reference for the specific method utilized
- 7. State the positive control tested
- 8. Significance of changes from Acceptance Criteria

81-7 Acute Neurotoxicity in the Hen

ACCEPTANCE CRITERIA

Does your study meet the following acceptance criteria?

1	Study performed on an organophosphate cholinesterase inhibiting compound.
•	
2	Technical form of the active ingredient tested.
3.=	Positive control utilized.
4	Species utilized, domestic laying hen 8-14 months of age.
5	Dosing oral by gavage or capsule (dermal or inhalation
	may be used).
6	An acute oral LD is determined.
7.—	Dose tested equal to an acute oral LD or a limit test of
	5000 mg/kg.
	Dosed animals may be protected with atropine and/or 2-
	PAM.
9.	Sufficient test animals so that at least 6 survive.
10.	Negative (vehicle) control group of at least 6 hens
11	Positive control of at least 4 hens. (if used)
;;· ~	Test dose repeated if no signs of delayed neurotoxicity
±2·	observed by 21 days after dosing.
1 2	Observed by 21 days after dosing.
13	Observation period 21 days after each dose.
14	Individual daily observations. Individual body weights.
15	Individual body weights.
	Individual necropsy not required.
17	Histopathology performed on all animals. Tissue to be
	fixed in sin preferably using whole animal perfusion
	techniques. At least three sections of each of the
	following tissues:
	brain, including medulla oblongata
	spinal cord; upper cervical, mid-thoracic and
	lumbro-sacral regions
•	tibial nerve; proximal regions and branches
	sciatic nerve
	BATGATA HET AC

Criteria marked with a * are supplemental and may not be required for every study.

ATTACHMENT F COST SHARE AND DATA COMPENSATION FORMS



United States Environmental Protection Agency Washington, DC 20460

CERTIFICATION WITH RESPECT TO DATA COMPENSATION REQUIREMENTS Approval Expires 12-31-92

Form Approved OMB No. 2070-0108

Public reporting burden for this collection of Information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M. St., S.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

ဇ	ompany Name	Company Number
Ch	nemical Name	EPA Chemical Number
IC	erilly that:	
۱.	For each study cited in support of reregistration under the Fe (FIFRA) that is an exclusive use study, I am the original data sthe original data submitter to cite that study.	
	That for each study cited in support of reregistration under FIF original data submitter, or I have obtained the written permissi writing the company(ies) that submitted data I have cited and in accordance with section 3(c)(1)(D) and 3(c)(2)(D) of FIFRA data are subject to the compensation requirement of FIFRA a companies I have notified are: (check one)	ion of the original data submitter, or I have notified in have offered to: (a) Pay compensation for those data ; and (b) Commence negotiation to determine which
	f 1 All companies on the data submitters' list for he active in Method or Cite-All option under the Selective Method). below.)	
	[] The companies who have submitted the studies listed or sheets, or indicated on the attached "Requirements State	
	That I have previously complied with section 3(c)(1)(D) of FIFI reregistration under FIFRA.	RA for the studies I have cited in support of
81	Ignature	Date
Na	me and Title (Please Type or Print)	
	NERAL OFFER TO PAY: I hereby offer and agree to pay come spiritation of my products, to the extent required by FIFRA sections.	
S lg	nature	Date



United States Environmental Protection Agency Washington, DC 20460

CERTIFICATION OF OFFER TO COST SHARE IN THE DEVELOPMENT OF DATA Approved Expires 12-31-92

Form Approved

OMB No. 2070-0106

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Company Name	Company Number
Chemical Name	EPA Chemical Number
I Certify that:	
My company is willing to develop and submit the data required by insecticide, Fungicide and Rodenticide Act (FIFRA), if necessary, enter into an agreement with one or more registrants to develop it data.	However, my company would prefer to
My firm has offered in writing to enter into such an agreement. The	hat offer was irrevocable and included
offer to be bound by arbitration decision under section 3(c)(2)(E terms could not be reached otherwise. This offer was made to the	3)(iii) of FIFRA if final agreement on a
offer to be bound by arbitration decision under section 3(c)(2)(E terms could not be reached otherwise. This offer was made to the	3)(iii) of FIFRA if final agreement on a
offer to be bound by arbitration decision under section 3(c)(2)(E terms could not be reached otherwise. This offer was made to the date(s):	3)(iii) of FIFRA if final agreement on a e following firm(s) on the following
offer to be bound by arbitration decision under section 3(c)(2)(E terms could not be reached otherwise. This offer was made to the date(s):	3)(iii) of FIFRA if final agreement on a e following firm(s) on the following
offer to be bound by arbitration decision under section 3(c)(2)(E) terms could not be reached otherwise. This offer was made to the date(s): Name of Firm(e)	3)(iii) of FIFRA if final agreement on a e following firm(s) on the following
offer to be bound by arbitration decision under section 3(c)(2)(E) terms could not be reached otherwise. This offer was made to the date(s): Name of Firm(e)	and that the statements that I have made acknowledge that any knowingly false or
offer to be bound by arbitration decision under section 3(c)(2)(E) terms could not be reached otherwise. This offer was made to the date(s): Name of Firm(e) Certification: I certify that I am duly authorized to represent the company named above, this form and all attachments therein are true, accurate, and complete. I am	and that the statements that I have made acknowledge that any knowingly false or

APPENDIX G

Product Specific Data Call-In

ATTACHMENT A . CHEMICAL STATUS SHEET

ATTACHMENT A

SOAP SALTS: DATA CALL-IN CHEMICAL STATUS SHEET

INTRODUCTION

You have been sent this Data Call-In Notice because you have products containing soap salts.

This attachment, the <u>Data Call-in Chemical Status Sheet</u>, contains a point of contact for inquiries. This attachment is to be used in conjunction with (1) the <u>Data Call-In Notice</u>, (2) Attachment B, the <u>Data Call-In Response Form</u>, (3) Attachment C, the <u>Requirement Status and Registrant's Response Form</u> for product specific data, (4) Attachment D, <u>EPA Grouping of End-Use Products for Meeting Acute Toxicology Data Requirements for Reregistration</u>, (5) Attachment E, <u>EPA Acceptance Criteria</u>, (6) Attachment F, <u>List of All Registrant(s) sent this Data Call-In Notice</u>, and (7) Attachment G, the <u>Cost Share and Data Compensation Forms</u> for product specific data, and <u>Product Specific Data Report Form</u> for use in replying to this soap salts Data Call-In. Instructions and guidance accompany each form.

DATA REQUIRED BY THIS NOTICE

The additional data requirements needed to complete the database for soap salts are listed in the Requirements Status and Registrant's Response Form, Attachment C.

The Agency has concluded that product specific data are needed for soap salts. The required additional data are listed in Attachment C.

Depending on the results of the studies required in this Notice, additional testing may be required.

INOUIRIES AND RESPONSES TO THIS NOTICE

If you have any questions regarding the <u>product specific data requirements</u> and procedures established by this Notice, please contact Robert Forrest (703) 305-6600. All responses to this Notice should be submitted to:

Document Processing Desk (RED/RD/PM-14)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, D.C. 20460

RE: Soap salts

ATTACHMENT B

PRODUCT SPECIFIC DATA CALL-IN RESPONSE FORMS (Form A) PLUS INSTRUCTIONS

INSTRUCTIONS FOR COMPLETING THE "DATA CALL-IN RESPONSE" FORM FOR PRODUCT SPECIFIC DATA

- Item 1-4. Already completed by EPA.
- Item 5. If you wish to voluntarily cancel your product, answer "yes." If you choose this option, you will not have to provide the data required by the Data Call-In Notice and you will not have to complete any other forms. Further sale and distribution of your product after the effective date of cancellation must be in accordance with the Existing Stocks provision of the Data Call-In Notice (Section IV-C).
- Item 6. Not applicable since this form calls in product specific data only. However, if your product is identical to another product and you qualify for a data exemption, you must respond with "yes" to Item 7a (MUP) or 7B (EUP) on this form, provide the EPA registration numbers of your source(s); you would not complete the "Requirements Status and Registrant's Response" form. Examples of such products include repackaged products and Special Local Needs (Section 24c) products which are identical to federally registered products.
- Item 7a. For each manufacturing use product (MUP) for which you wish to maintain registration, you must agree to satisfy the data requirements by responding "yes."
- Item 7b. For each end use product (EUP) for which you wish to maintain registration, you must agree to satisfy the data requirements by responding "yes." If you are requesting a data waiver, answer "yes" here; in addition, on the "Requirements Status and Registrant's Response" form under Item 9, you must respond with Option 7 (Waiver Request) for each study for which you are requesting a waiver. See Item 6 with regard to identical products and data exemptions.
- Items 8-11. Self-explanatory.
- NOTE: You may provide additional information that does not fit on this form in a signed letter that accompanies this form. For example, you may wish to report that your product has already been transferred to another company or that you have already voluntarily cancelled this product. For these cases, please supply all relevant details so that EPA can ensure that its records are correct.

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 8. Certification 4. EPA Product Registration Signature and Title of Company's Authorized Representative Use additional sheet(s) if necessary. or both under applicable law. 400-383 1. Company name and Address 10. Hamme of Company Contact INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. 74 AMITY RD UNIROYAL CHEMICAL CO BETHANY CT 06524 cancel this terity. tration volunproduct regis-5. I wish to United States Environmental Protection Agency Data Exemption because I obtain the active ingredient 6. Generic Data tration number listed below from the source EPA regis-60. I um claiming a Generic N.A. Washington, D. DATA CALL-IN RESPONSE 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic C. 20460 Soap salts N.A. Response." form entitled "Requirements Status and Registrant's requirements on the ettached 7. Product Specific Data I agree to satisfy the MUP 7e. My product is a MUP and 9. Date 11. Phone Number 3. Date and Type of DCI PRODUCT SPECIFIC requirements on the attached form entitled "Requirements Status and Registrant's I agree to satisfy the EUP Response." 76. My product is an EUP and Form Approved CMB No. 2070-0107 Approval Expires 12-31-92

Page of

United States Environmental Protection Agency DATA CALL-IN RESPONSE Washington, D. C. 20460 CHE No. 2070-0107 Form Approved

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 4. EPA Product Registration Signature and little of Company's Authorized Representative or both under applicable law. 8. Certification Use additional sheet(s) if necessary. 400-429 1. Company name and Address 10. Name of Company Contact INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. BETHANY CT UNIROYAL CHEMICAL 74 AMITY RD 06524 tration voluncancel this 5. I wish to terily. product regis-8 Data Exemption because I obtain the active ingredient from the source EPA registration number listed below. 6. Generic Data 6a. I am claiming a Generic N.A. 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic N.A. Soap salts I agree to setisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response." 7. Product Specific Data 7a. Wy product is a MUP and 9. Date 11. Phone stumber 3. Date and Type of DCI PRODUCT SPECIFIC I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's 7b. My product is an EUP and Response." Approval Expires 12-31-92

United States Environmental Protection Agency Washington, D. C. 20460

Approval Expires 12-3

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	DATA CALL-IN	-IN RESPONSE			Approvat Expires 12-31-92
INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.		Please read carefully the attached instructions and supply the	information requested on this form.	on this form.	
1. Company name and Address CHEVRON CHEMICAL COMPANY REGISTRATION & REGULATORY 940 HENSLEY STREET RICHMOND CA 94804	ORY AFFAIRS DE	2. Case # and Name 4083 Soap salts		3. Date and PRODUC	3. Date and Type of DCI PRODUCT SPECIFIC
ct .	6. Generic Data		7. Product Specific Date	Deta	
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239-2564	N.A.	N.A.			
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8. Certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and little of Company's Authorized Representative	ris form and all attachments may statement may	s are true, accurate, and complete. be punishable by fine, imprisonment i	9. Date	Jace	
10. Name of Company Contact				11. Phone Number	

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary. Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment Registration 4. EPA Product or both under applicable law. 8. Certification 36488-36 10. Name of Company Contact Company name and Address DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910 5. I wish to product registration voluncancel this terily. United States Environmental Protection Agency Data Exemption because I obtain the active ingredient 6. Generic Data de. I am claiming a Generic from the source EPA registration number listed below. N.A. DATA CALL-IN RESPONSE Washington, D. C. 20460 2. Case # and Name 4083 6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled Registrant's Response." "Requirements Status and N.A. Soap salts requirements on the attached form entitled "Requirements Response." Status and Registrant's 7a. Wy product is a MLP and I agree to satisfy the MLP 7. Product Specific Data 9. Dete 11. Phone Humber 3. Date and Type of DCI PRODUCT SPECIFIC I agree to satisfy the EUP requirements on the attached form entitled "Requirements Response.* Status and Registrant's 76. My product is an EUP and CHR No. 2070-0107 Form Approved Approval Expires 12-31-92

4. EPA Product Registration 10. Name of Company Contact Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. 8. Certification 36488-33 Use additional sheet(s) if necessary. INSTRUCTIONS: Please type or print in ink. Company name and Address DELTA ANALYTICAL CORP DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910 product regiscancel this 5. I wish to carily. tration volun-United States Environmental Protection Agency 6a. I am claiming a Generic Data Exemption because I obtain the active ingredient 6. Generic Data from the source EPA regis-tration number listed below. Please read carefully the attached instructions and supply the information requested on this form. N.A. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic Soap salts N.A. I agree to satisfy the MLP requirements on the attached form entitled "Requirements Status and Registrant's 7a. My product is a MUP and 7. Product Specific Data 9. Date 11. Phone Humber 3. Date and Type of DCI PRODUCT SPECIFIC i agree to satisfy the EUP requirements on the attached form entitled "Requirements Statum and Registrant's 7b. My product is an EUP and CHE No. 2070-0107 Form Approved Approval Expires 12-31-92

United States Environmental Protection Agency DATA CALL-IN RESPONSE Washington, D. C. 20460 CHB No. 2070-0107 form Approved

Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment Registration 4. EPA Product B. Certification or both under applicable law. 10. Name of Company Contact 36488-32 Use additional sheet(s) if necessary. INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Company name and Address
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AGENT FOR: ATTACK PESTICIDES
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SILVER SPRINGS MD 20910 5. I wish to tration volunproduct regiscancel this terity. Data Exemption because I obtain the active ingredient 6a. I am claiming a Generic 6. Generic Data tration number listed below. from the source EPA regis-Z.A. 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic Z.A. Soap salts I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's 7. Product Specific Data Response." 7a. My product is a MUP and 9. Date 11. Phone Number . 3. Date and Type of DCI PRODUCT SPECIFIC I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's To. My product is an EUP and Approval Expires 12-31-92

United States Environmental Protection Agency Washington, D. C. 20460 DATA CALL-IN RESPONSE

CHE NO. 2070-0107 form Approved

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1. Company name and Address DELITA ANALYTICAL CORP AGENT FOR: ATTACK PES 1414 FENWICK LN SILVER SPRINGS MD 20	ORP PESTICIDES 20910	2. Case # and Name 4083 Soap salts	3. Date PROI	3. Date and Type of DCI PRODUCT SPECIFIC
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36488-31 36488-31 6. Certification Cortify that the statements made acknowledge that any knowingly fact that on both under applicable law.	N.A. N.A. Ise or misleading statement may	N.A. N.A. N.A. N.A. N.A. N.A. Certification certify that the statements made on this form and all attachments are true, accurate, and complete. acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment r both under applicable law.	9. Date	
B. Certification I certify that the statements made on this form and all at acknowledge that any knowingly false or misleading state or both under applicable law. Signature and Title of Company's Authorized Representative	on this form and all attachment lse or misleading statement may thorized Representative	ts are true, accurate, and complete. / be punishable by fine, imprisonment	9. Date	
10. Make of Company Contact			11. Phone Huaber	Der

United States Environmental Protection Agency Washington, D. C. 20460 DATA CALL-IN RESPONSE

ONB No. 2070-0107
Approval Expires 12-31-92

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10. Name of Company Contact	tact			11.	11. Phone tumber	

4. EPA Product Signature and Title of Company's Authorized Representative I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment Registration or both under applicable law. 8. Certification 42697-2 Use additional sheet(s) if necessary. 10. Name of Company Contact INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 cancel this 5. I wish to product registarily. tration volun-United States Environmental Protection 20910 Onto Exemption because I obtain the active ingredient 6. Generic Data 6a. I am claiming a Generic tration number listed below from the source EPA regis-N.A. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic N.A. Soap salts Agency I agree to matisfy the MLP requirements on the attached form entitled "Requirements Response." Status and Registrant's 7. Product Specific Date 7a. My product is a MUP and 9. Date 11. Phone Number 3. Date and Type of DCI PRODUCT SPECIFIC requirements on the attached form entitled "Requirements Status and Registrant's Response." 76. Ny product is an EUP and agree to satisfy the EUP Form Approved CMS No. 2070-0107 Approval Expires 12-31-92

	11. Phone Wumber	, n.	•		ontact	10. Name of Company Contact
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Approval Expires 12-31-92			RESPONSE	DATA CALL-IN RESPONSE		
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4. EPA Product Registration 1. Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 42697-7 Use additional sheet(s) if necessary. INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. 5. I wish to cancel this product registration volun-United States Environmental Protection Agency 20910 Obtain the active ingredient 6. Generic Data 6a. I am claiming a Generic tration number listed below. from the source EPA regis-N.A. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 "Requirements Status and Registrant's Response." on the attached form entitled Data requirements as indicated 6b. I agree to satisfy Generic N.A. Soap salts 7. Product Specific Data Response." Status and Registrant's form entitled "Requirements I agree to satisfy the MUP requirements on the attached 7a. My product is a MUP and 3. Date and Type of OCI PRODUCT SPECIFIC Status and Registrant's form entitled "Requirements requirements on the attached Response." E agree to satisfy the EUP 76. My product is an EUP and form Approved CHE No. 2070-0107 Approval Expires 12-31-92 Page 1 of

I certify that the statements made on this form and all attachments are true, accurate, and complete, a acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment

9. Date

11. Phone Humber

Signature and Title of Company's Authorized Representative

10. Name of Company Contact

or both under applicable law.

8. Certification

4. EPA Product Registration Signature and Title of Company's Authorized Representative or both under applicable law. I certify that the statements mode on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 42697-10 Use additional sheet(s) if necessary. 10. Name of Company Contact INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 Certification product regiscancel this 5. I wish to tration voluterity. United States Environmental Protection 20910 Data Exemption because I obtain the active ingredient 6. Generic Data 60. I am claiming a Generic tration number listed below. from the source EPA regis-Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Hame 4083 "Requirements Status and on the attached form entitled Data requirements as indicated 6b. I agree to satisfy Generic Registrant's Response. Soap salts Agency 7. Product Specific Data Response." Status and Registrant's form entitled "Requirements requirements on the ettached I agree to satisfy the MLP 7a. Hy product is a HLP and 9. Dete 11. Phone Busber 3. Date and Type of DCI PRODUCT SPECIFIC Status and Registrant's form entitled "Requirements requirements on the attached I agree to satisfy the EUP 7b. My product is an EUP and QMB No. 2070-0107 form Approved Approval Expires 12-31-92

United States Environmental Protection Agency Washington, D. C. 20460 DATA CALL-IN RESPONSE QMB No. 2070-0107 Form Approved Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 209 20910 2. Case # and Name 4083 Soap salts 3. Date and Type of DCI
PRODUCT SPECIFIC

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10. Name of Company Contact	8. Certification J certify that the statements made on this form and all atilizentially that the statements made on this form and all atilizentely that any knowingly false or misleading states or both under applicable law. Signature and Title of Company's Authorized Representative.	42697-11	4. EPA Product Registration
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	United	State	ental Protection Agency			Form Approved
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3. Date and Type of DCI PRODUCT SPECIFIC	3. Date PRO		Case # and Name 4083 Soap salts	2.	ANALYTICAL CORP FOR: SAFER INC PENWICK LN SPRINGS MD 20910	1. Company name and Address DELITA ANALYTICA. AGENT FOR: SAFE 1414 FENWICK LN SILVER SPRINGS
orm.	ted on this f	information requested on this form.	Please read carefully the attached instructions and supply the		type or print in in s) if necessary.	INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.
Approval Expires 12-31-92			RESPONSE	DATA CALL-IN		
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or both under applicable law. Signature and Title of Company's Authorized Representative 10. Name of Company Contact	8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowlingly false or misleading statement may be purishable by fine imprisonment			42697-16 N.A. N.A.	Registration cancel this 60. 1 am claiming a Generic 60. 1 agree to satisfy Generic 7 product regis- tration volun- tearity. 60. 1 am claiming a Generic 60. 1 agree to satisfy Generic 7 Data Examption because 1 obtain the active ingredient on the attached form entitled of the source EPA regis- tration number listed below. Registrant's Response.** Registration of the attached form entitled of the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.** Registration obtain the source EPA registrant's Response.**	t 5. I wish to 6. Generic Data
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			•		7b. Ny product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	

						Page 1 of 1
	Unite	United States Environme	Environmental Protection Agency	•		Form Approved
		Washington,	Washington, D. C. 20460			CHB No. 2070-0107
		DATA CALL-I	CALL-IN RESPONSE			Approval Expires 12-31-92
INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.	pe or print in in	k. Please read carefully the attached instructions	ettached instructions and supply the	information requested on this form.	d on this form.	
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER 1414 FENWICK LN SILVER SPRINGS M	Press PICAL CORP SAFER INC C LN C LN 1GS MD 20910	2.	Case # and Hame 4083 Soap salts		3. Date and Typ PRODUCT	3. Date and Type of DCI PRODUCT SPECIFIC
4. EPA Product	5. I wish to	6. Generic Data	·	7. Product Specific Data	c Data	
Registration	cancel this product registration voluntarily.	6s. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. 1 agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7s. My product is a MLP and I agree to satisfy the MLP requirements on the attached form entitled "Requirements Status and Registrant's Response."		75. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
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10. Name of Company Contact	Kect			3	11. Phone Humber	

	11. Phone Kumber	. 11.			ontact	10. Hame of Company Contact
		*	true, accurate, and complete. anishable by fine, imprisonment	I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative	stements made on th y knowingly false o ble law. f Company's Authori	I certify that the statements made on this form and all at I acknowledge that any knowingly false or misleading state or both under applicable law. Signature and Title of Company's Authorized Representative
				N.A.		42697-33
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3. Date and Type of DCI PRODUCT SPECIFIC	3. Date an PRODU		tase # and Name 4083 Soap salts	2.	ddress (TICAL CORP SAFER INC K LN NGS MD 20910	1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER 1414 FENWICK LN SILVER SPRINGS MD
	on this form	information requested on this form	Please read carefully the attached instructions and supply the	i	type or print in irs) if necessory.	INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.
Approval Expires 12-31-92			CALL-IN RESPONSE	DATA CALL-IN		
Form Approved OHB No. 2070-0107		·	tal Protection Agency D. C. 20460	d States Environmental Pi Washington, D. C.	United	
Page 1 of 1			7.7.			

Registration 4. EPA Product Use additional sheet(s) if necessary. Signature and Title of Company's Authorized Representative or both under applicable law. I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 8. Certification 42697-34 INSTRUCTIONS: Please type or print in ink. 10. Name of Company Contact Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 tration volunproduct regiscancel this 5. I wish to United States Environmental Protection Agency 20910 Obtain the active ingredient 6. Generic Data from the source EPA regis-tration number listed below. 6a. I am claiming a Generic Please read carefully the attached instructions and supply the information requested on this form. N.A. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 On the attached form entitled Registrant's Response." "Requirements Status and 6b. I agree to satisfy Generic N.A. Soap salts 7. Product Specific Data Response.* Status and Registrant's requirements on the attached I agree to satisfy the MLP form entitled "Requirements 7a. Wy product is a MUP and 9. Date 11. Phone Kumber 3. Date and Type of DCI PRODUCT SPECIFIC form entitled "Requirements requirements on the ettached Status and Registrant's Response." 76. Wy product is an EUP CHE No. 2070-0107 Form Approved Approval Expires 12-31-92

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	9. Date	·	true, accurate, and complete. nishable by fine, imprisorment	certify that the statements made on this form and all attachments are true, accurate, and complete, acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and little of Company's Authorized Representative	atements made on ti y knowingly false o ble law. f Company's Authori	b. Certification certify that the statements made on this form and all at 1 certify that the statements made on this form and all at 1 acknowledge that any knowingly false or misleading states or both under applicable law. Signature and little of Company's Authorized Representative
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Approval Expires 12-31-92		•	CALL-IN RESPONSE	DATA CALL-IN		
Form Approved ONE No. 2070-0107			tal Protection Agency	d States Environmental Pi Washington, D. C.	United	
Page 1 of 1						

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 8. Certification Signature and Title of Company's Authorized Representative NC83001100 Registration 4. EPA Product 1. Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 or both under applicable law. Use additional sheet(s) if necessary. 10. Name of Company Contact INSTRUCTIONS: Please type or print in ink. cancel this 5. I wish to product registration volun-United States Environmental Protection Agency 20910 Data Exemption because I obtain the active ingredient 6. Generic Date 6a. I am claiming a Generic tration number listed below. from the source EPA regis-Please read carefully the attached instructions and supply the information requested on this form. Z.A. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 Registrant's Response." *Requirements Status and on the attached form entitled Data requirements as indicated 6b. I agree to satisfy Generic Soap salts 7. 2. Status and Registrant's requirements on the attached 7. Product Specific Date Response." I agree to satisfy the MUP form entitled "Requirements 7a. My product is a MUP and 9. Date 11. Phone Humber 3. Date and Type of DCI PRODUCT SPECIFIC i agree to satisfy the EUP requirements on the attached Response." Status and Registrant's form entitled "Requirements 76. My product is an EUP and CHE No. 2070-0107 Form Approved Approval Expires 12-31-92

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment Signature and Title of Company's Authorized Representative, or both under applicable law. B. Certification 53219-4 4. EPA Product Registration 10. Name of Company Contact 1. Company name and Address Use additional sheet(s) if necessary. INSTRUCTIONS: Please type or print in ink. SAN DIEGO CA 5451 OBERLIN DR. MYCOGEN CORPORATION 5. I wish to cancel this tration volunproduct regis-92121 United States Environmental Protection Agency 6. Generic Data Data Exemption because I obtain the active ingradient 6s. I am claiming a Generic tration number listed below. from the source EPA regis-Please read carefully the attached instructions and supply the information requested on this form. Washington, D. C. 20460 DATA CALL-IN RESPONSE 2. Case # and Name 4083 Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response." 6b. I agree to satisfy Generic Soap N.A. salts 7. Product Specific Data Response. form entitled "Requirements Status and Registrant's I agree to satisfy the MLP requirements on the attached 7e. My product is a MUP and 11. Phone Kuster 3. Date and Type of OCI PRODUCT SPECIFIC I agree to satisfy the EUP requirements on the attached form entitled "Requirements Response." Status and Registrant's 76. My product is an EUP and CHE No. 2070-0107 Form Approved Approval Expires 12-31-92

Page 1 of]

		Washington,	D. C. 20460		: a	OHR NO. 2070-0107
		DATA CALL-I	CALL-IN RESPONSE			Approval Expires 12-31-92
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I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	ments are true, accurate, and complete. May be punishable by fine, imprisonment i		
10. Name of Company Contact		11. Phone Number	£1

ATTACHMENT C

PRODUCT SPECIFIC REQUIREMENT STATUS AND REGISTRANT'S RESPONSE
(Forms B) PLUS INSTRUCTIONS
AND
PR NOTICE 86-5

INSTRUCTIONS FOR COMPLETING THE "REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE" FORM FOR PRODUCT SPECIFIC DATA

- Item 1-3 Completed by EPA. Note the unique identifier number assigned by EPA in Item 3. This number must be used in the transmittal document for any data submissions in response to this Data Call-In Notice.
- Item 4. The guideline reference numbers of studies required to support the product's continued registration are identified. These guidelines, in addition to the requirements specified in the Notice, govern the conduct of the required studies. Note that series 61 and 62 in product chemistry are now listed under 40 CFR 158.155 through 158.180, Subpart C.
- Item 5. The study title associated with the guideline reference number is identified.
- Item 6. The use pattern(s) of the pesticide associated with the product specific requirements is (are) identified. For most product specific data requirements, all use patterns are covered by the data requirements. In the case of efficacy data, the required studies only pertain to products which have the use sites and/or pests indicated.
- Item 7. The substance to be tested is identified by EPA. For product specific data, the product as formulated for sale and distribution is the test substance, except in rare cases.
- Item 8. The due date for submission of each study is identified. It is normally based on 8 months after issuance of the Reregistration Eligibility Document unless EPA determines that a longer time period is necessary.
- Item 9. Enter only one of the following response codes for each data requirement to show how you intend to comply with the data requirements listed in this table. Fuller descriptions of each option are contained in the Data Call-In Notice.
 - 1. I will generate and submit data by the specified due date (Developing Data). By indicating that I have chosen this option, I certify that I will comply with all the requirements pertaining to the conditions for submittal of this study as outlined in the Data Call-In Notice.
 - 2. I have entered into an agreement with one or more registrants to develop data jointly (Cost Sharing). I am submitting a copy of this agreement. I understand that this option is available only for acute toxicity or certain efficacy data and only if EPA indicates in an attachment to this Notice that my product is similar

enough to another product to qualify for this option. I certify that another party in the agreement is committing to submit or provide the required data; if the required study is not submitted on time, my product may be subject to suspension.

- 3. I have made offers to share in the cost to develop data (Offers to Cost Share). I understand that this option is available only for acute toxicity or certain efficacy data and only if EPA indicates in an attachment to this Data Call-In Notice that my product is similar enough to another product to qualify for this option. submitting evidence that I have made an offer to another registrant (who has an obligation to submit data) to share in the cost of that data. I am also submitting a completed "Certification of Offer to Cost Share in the Development Data" form. I am including a copy of my offer and proof of the other registrant's receipt of that offer. I am identifying the party which is committing to submit or provide the required data; if the required study is not submitted on time, my product may be subject to suspension. I understand that other terms under Option 3 in the Data Call-In Notice (Section III-C.1.) apply as well.
- 4. By the specified due date, I will submit an existing study that has not been submitted previously to the Agency by anyone (Submitting an Existing Study). I certify that this study will meet all the requirements for submittal of existing data outlined in Option 4 in the Data Call-In Notice (Section III-C.1.) and will meet the attached acceptance criteria (for acute toxicity and product chemistry data). I will attach the needed supporting information along with this response. I also certify that I have determined that this study will fill the data requirement for which I have indicated this choice.
- 5. By the specified due date, I will submit or cite data to upgrade a study classified by the Agency as partially acceptable and upgradable (Upgrading a Study). I will submit evidence of the Agency's review indicating that the study may be upgraded and what information is required to do so. I will provide the MRID or Accession number of the study at the due date. I understand that the conditions for this option outlined Option 5 in the Data Call-In Notice (Section III-C.1.) apply.
- 6. By the specified due date, I will cite an existing study that the Agency has classified as acceptable or an existing study that has been submitted but not reviewed by the Agency (Citing an Existing Study). If I am citing another registrant's study, I understand that this option is available only for acute toxicity or certain efficacy

data and only if the cited study was conducted on my product, an identical product or a product which EPA has "grouped" with one or more other products for purposes of depending on the same data. I may also choose this option if I am citing my own data. In either case, I will provide the MRID or Accession number(s) for the cited data on a "Product Specific Data Report" form or in a similar format. If I cite another registrant's data, I will submit a completed "Certification With Respect To Data Compensation Requirements" form.

7. I request a waiver for this study because it is I am inappropriate for my product (Waiver Request). attaching a complete justification for this request, including technical reasons, data and references to relevant EPA regulations, guidelines or policies. [Note: any supplemental data must be submitted in the format required by P.R. Notice 86-5]. I understand that this is my only opportunity to state the reasons or provide information in support of my request. If the Agency approves my waiver request, I will not be required to supply the data pursuant to Section 3(c)(2)(B) of FIFRA. If the Agency denies my waiver request, I must choose a method of meeting the data requirements of this Notice by the due date stated by this Notice. In this case, I must, within 30 days of my receipt of the Agency's written decision, submit a revised "Requirements Status and Registrant's Response" Form indicating the option chosen. I also understand that the deadline for submission of data as specified by the original data call-in notice will not change.

Items 10-13. Self-explanatory.

NOTE: You may provide additional information that does not fit on this form in a signed letter that accompanies this form. For example, you may wish to report that your product has already been transferred to another company or that you have already voluntarily cancelled this product. For these cases, please supply all relevant details so that EPA can ensure that its records are correct.

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	•	13. Phone Humber						İ				any Contact	12. Name of Company Contact
										tative	Signature and little of Company's Authorized Representative	tle of Compa	Signature and Ti
					lete. orment	e, impris	accurate, ite by fir	true, unishab	nts ere	all attachme statement m	i certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	he statement at any knowi plicable law	<pre>j certify that the statements l acknowledge that any knowin or both under applicable law.</pre>
		11. Date				Ì						3	10. Certification
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	8 mos.			X	HIJK	ABC					Density		63-7
	8 mos.		MP/EP	3	ACIH	ABC					Odor		63-4
	8 mos.		EP	I	HIJK	ABC					Physical state		63-3
31			EP	3	HIJK	ABC					Cotor		63-2
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FIC	PRODUCT SPECIFIC	3. Date and Type PRODUCT			•	salts	Case # and Name 4083 Soap	Case # a 4083	بر 0 4		AL CO INC	and Address , CHEMICAL	1. Company name and Address UNIROYAL CHEMI
	1.	Please read carefully the attached instructions and supply the information requested on this form.	ation reques	inform	supply the	tions and	instruc	ttached	y the a	ead carefull	ink.	ease type or heet(s) if r	INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.
Approval Expires 12-31-92	Approval Ex				RESPONSE		REGISTRANT'S	REGI	AND	STATUS	REQUIREMENTS		
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United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

ONS No. 2070-0107

Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

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1. Company name and Address UNIROYAL CHEMI	nd Address CHEMICAL CO INC	'n	Case # 4 083		E 3	and Name Soap	ש	salts			į	3. Dete	ğ	Date and Type of DCI PRODUCT SPECIFIC TIN# AND-SD-2317	I IFIC
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4. Guideline Requirement	5. Study Title		0-0-7		33	Progress Reports		6. Use Pettern			7. Test Substance		6. T	8. Time	9. Registrant Response
Number			حص	-	~	u									
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63-16		(12)					_	ABC	HIJK M	- •	OMP/EP			8 mos.	
63-17	Storage stability		_				_	ABC			OMP/EP			8 mos.	
63-18		(13)					_	ABC	HIJK M		OMP/EP			8 mos.	
63-19	Miscibility	(35)					_	ABC	HIJK K	0			_	8 mos.	
63-20	Corrosion characteristics						-	ABC	HIJK M	0	OMP/EP			8 mos.	
63-21	Dielectric breakdown voltage	(15)	_				_	ABC	HIJK M	0	EP			8 mos.	
	Acute Toxic - Regular Chemical				٠								•		
81-1	Acute oral toxicity-rat	(1,36,37)					_	ABC	HIJK M		MP/EP			8 100	
81-2	Acute dermal	(1,2,37)			-			ABC	HIJK M		OMP/EP		٠	8 mos.	
81-3	Acute inhelation toxicity-rat						.	ABC						8 mos.	
0114	#	(2)						ABC	HIJK W						
81-6	Dermot sensitization	6.0						ABC	HIJK K	00	MP/EP			8 mos.	٠
	Efficacy - Vertebrate Control Agents	ents	_				_				;			***	
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	cion is on page one).								 						

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

IGA) = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; data pertaining to the purchased product. [HOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

Use Categories Key:

Residential outdoor

- A Terrestrial food crop Aquatic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic nonfood residential
 L - Indoor food
 - C Terrestrial nonfood crap
 N Greenhouse food crap
- I Greenhouse nonfood crop E - Aquatic nonfood outdoor J . Forestry

D - Aquatic food crop

FOOTNOTES: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement enelytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- u If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingradients shall be submitted to the extent this information is available.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products product analytical method and data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- 4 Certified limits are not required for inert ingredients in products proposed for experimental use.
- Required if test substances are dispersible with water.
- ≈ = 5 Required if product contains an oxidizing or reducing agent.
 - Required if product contains combustible liquids.
- Required if product is potentially explosive.
- if product is a liquid.
- if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- of potential eye and dermal irritation effects. Not required if test material is corrosive to skin or has pit less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- . Required unless repeated dermal exposure does not occur under conditions of use.

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Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such the relevant data upon which the determination of efficacy is based. his products are efficacious when used in accordance with label directions and commonly accepted pest control practices. The registrant must develop and maintain or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGAI = requirements identified in the tables.]; TEP = typical end-use product; TGAI = requirements identified in the tables.]; TEP = typical end-use product; data pertaining to the purchased product. [HOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: AP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

K - Residential outdoor

F - Aquatic monfood Industrial - Terrestrial food crop B - Terrestrial food feed crop
 G - Aquatic monfood residential

Indoor tood

- N Greenhouse food crop C - Terrestrial nonfood crop D - Aquetic food crop
- I Greenhouse nonfood crop .J - Forestry E - Aquetic nonfood outdoor

FOOTHOTES: The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

M - Indoor nonfood

N - Indoor Medical

Prod Ches - Regular Chemical

- 1 Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
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- Required if test substances are dispensible with water.
- Required if product contains an oxidizing or reducing agent.
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- **・ロコスロスカ** Required if product is a liquid.
- Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- N Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- X ~
- Required unless repeated dermal exposure does not occur under conditions of use.

 Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

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United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

CHB NO. 2070-0107

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63-12	pM (9) Oxidizing or reducing action (10)						> >	ABC ABC	KLIH KLIH	**		OMP/EP				mos.		
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United States Environmental Protection Agency

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

data pertaining to the purchased product.[MOIE: If a product is a 100 percent repeckage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; IGA1 = technical grade of the active ingredient; PA1 = "pure" active ingredient; PA1RA = "pure" active ingredient, radiolabeled. HP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

Use Categories Key:

K - Residential outdoor

Indoor food

- F Aquatic nonfood Industrial A - Terrestrial food crop B - Terrestrial food feed crop
 G - Aquatic monfood residential C - Terrestrial nonfood crop
 H - Greenhouse food crop
- M Indoor nonfood N - Indoor Medical Greenhouse nanfood crap D - Aquatic food crop 0 - Indoor residential J - Forestry Aquatic nonfood outdoor

FOOTNOTES: (The following motes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *i58.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.160 for enforcement discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
- A schemetic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.

If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted

ត

- Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products product an integrated system.

 Data on other end-use products will be required on a case-by-case basis. For posticides in the development state, a rudimentary product analytical method and data the extent this information is available. will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use.
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
 Required if product contains combustible liquids.
- Required if product is potentially explosive.

- Required if product is a liquid.
- **はまこれご**る Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents. end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- which have demonstrated a potential to adversely affect the visual system. Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bata, camids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that

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		11. Date		ent	and complet e, imprisorm	accurate, able by fine	punish	ttachments a	10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative	10. Certification I certify that the statements I acknowledge that any knowin or both under applicable law. Signature and Title of Compan
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9. Registrant Response	6. Time	•	7. Test Substance		6. Use Pattern	Progress Reports			Study Title	4. Guideline Requirement Number
IFIC -2323	PRODUCT SPECIFIC ID# 36488-RD-2323	J. Dat PR ID		3-36	salts	Soap s	Case # 4083 EPA		SAL CORP CACK PESTICIDES N 20910	1. Company name and Address DELTA ANALYTICAL (AGENT FOR: ATTACK 1414 FENWICK LN SILVER SPRINGS MD
Form Approved ONB No. 2070-0107 Approval Expires 12-31-92		information requested on this form.	ation reque	, , , , , ,	ad RE On	ntal Protection D. C. 20460 REGISTRANT'S R	ental D. D. D. REC	es Environmental Protecti Washington, D. C. 20460 S STATUS AND REGISTRANT'S	UIREMENT	Unit REQUINSTRUCTIONS: Please type or print in Use additional sheet(s) if necessary.

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	Wash	ton,!	D.	Ċ.	20460					CHB No. 2070-0107	970-0107
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1. Company name and Address DELTA ANALYTICAL (AGENT FOR: ATTACK	TACK PESTICIDES	2. c	Case # 4083	. 3	and Name Soap	o salts			3. Date PROI	Date and Type of DCI PRODUCT SPECIFIC ID# 36488-RD-2323	IFIC -2323
SILVER SPRINGS	S MD 20910		EPA	Reg.		No. 364	36488-36				
4. Guideline Requirement	5. Study Title	O-40#₹		₽ P	Progress Reports	6. Use		7. Test Substance		8. Time Frame	9. Registrant Response
Number	•		-	2	u						
63-15	Flammability (1	3	•			ABC	HIJK M			8 mos.	
63-16	Explodability (1	(12)	·			ABC		OMD/ED		8 BOG.	
63-18		(13)				ABC	×			œ	
63-19		<u> </u>				ABC	×	OMP/EP		8 mos.	
63-21	Dielectric breakdown voltage (1	(15)				ABC		O EP		. BOM .	
	Acute Toxic - Regular Chemical	· :					1 1 1 2 2 3 4 4 3 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1				
81-1	Acute oral toxicity-rat	(1,36,37)				ABC	HIJK M	M OMP/EP		8 1108.	
81-2	Acute dermal	(1,2,37)				ABC		M OMP/EP		8 mos.	
81-3						ABC	HIJK	May /	90 90	8 1108.	
81-4	<u>=</u>	, 8	:			ABC		OMP/EP		8 nos.	
81-6	Dermal sensitization (8				ABC	寓:	OMP/EP		8 mos.	
	Efficacy - Vertebrate Control Agents	nts				•		· · · · · · · · · · · · · · · · · · ·	*		
96-19	Browsing animal repellents (1)	<u>.</u>	· · · · · · · · · · · · · · · · · · ·			ABC	*	13		8 mos.	
Initial to indicate certification as to info (full text of certification is on page one).	Initial to indicate certification as to information on this page (full text of certification is on page one).	page	·	ł			Date				٠

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

data pertaining to the purchased product. (NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical and use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. Key: #P = menufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

K - Residential outdoor

L - Indoor food

- F Aquetic nonfood Industrial A - Terrestrial food crap B - Terrestrial food feed crop
 G - Aquatic nonfood residential
- C Terrestrial nonfood crop

 M Greenhouse food crop

- E Aquetic nanfood outdoor J Forestry
- M Indoor manfood - N - Indoor Medical Greenhouse nonfood crop 0 - Indoor residentiel

D - Aquatic food crop

FOOT DOTES: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted the extent this information is available.
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use.
- りゅうけんじんじん Required if test substances are dispersible with water.
 - Required if product contains an oxidizing or reducing agent.
 - Required if product contains combustible liquids.
 - Required if product is potentially explosive.
 - Required if product is a liquid.
 - Required if product is an emulaifiable liquid and is to be diluted with petroleum solvents.
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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083

Soap salts

Footnotes (cont.):

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37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

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REQUIREMENTS United States Environmental Protection Washington, STATUS AND REGISTRANT'S D. ဂ 20460 RESPONSE Agency Form Approved Approval Expires 12-31-92 CHE No. 2070-0107

63-7 63-4 63 - 363-2 62 - 3I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. 62-2 62-1 INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary. 61-2(a) 4. Guideline Signature and Title of Company's Authorized Representative 63-14 63-12 61-2(b) 61 - 1Requirement 12. Name 10. Certification Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD 20910 of Company Contact 5. Study Title Prod Chan - Regular Chamical Density ğ Preliminary analysis Discussion of formation of Descrip of starting materials, (1,2) Oxidizing or reducing action Physical state Color Analytical method Certification of limits Product identity & composition(1) production & formulation impurities Please read carefully the attached instructions and supply the information requested on this form. (1,3) (1,5) 3,5 3 4083 Case # and Name 000-0 EPA Reg. Progress Reports N Soap No. ABC ABC ABC ABC ABC ABC ABC ABC salts ABC ABC ABC 6. Use Pattern 36488-33 HIJK HIJK HIJK KLIK HIJK KLJK HIJK HIJK 3 Z Z 0 0 0 0 0 0 0 0 0 OMP/EP 0 MP/EP AB/EP HP/EP MP/EP MP/EP MP/EP MP/EP MP/EP HP/EP HP/EP MP/EP 7. Test Substance 7/2 şa N 13. Phone Number Date 3. Date and Type of DCI PRODUCT SPECIFIC ID# 36488-RD-2322 . I & & & **@ @** . . . 0 BOS. mog. mos. mos. mos. mos. mos. mos. mos. mos. mos. 9. Registrant Response

			Date	-	F		s page	Initial to indicate certification as to information on this page (full text of certification is on page one).	Initial to indicate certification as to info (full text of certification is on page one).	
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		*** ***		_	•		enta .	Efficacy - Vertebrate Control Agenta		
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	mos.		3	ABC			(1,2)	Primary dermal irritation	81-5	
	306.	OMP/EP	3	ABC			3	Primary eye irritation-rabbit (2)	81-4	
Ž.	80 HOS.)MP/EP	HIJK M O	ABC				Acute inhelation toxicity-rat	81-3	
er Se Se Se	8 mos.	OMP/EP	HIJK M	ABC		<u>-</u> .	(1,2,37)		81-2	
	8 108	OMP/EP	3	ABC	•		(1,36,37)	Acute oral toxicity-rat	81-1	
	10 A A A 10 A 10 A 10 A 10 A 10 A 10 A	34. -27.				<u>. </u>		Acute Toxic - Seguler Chemical		
**	8 mos.	BP Care Care Control	HIJK M O	ABC			(15)	Dielectric breakdown voltage	63-21	
		MP/EP	3	ABC		-	•	Corrosion characteristics	63-20	
: :	8 MOS.	OMP/EP	×	ABC		-	(34)	Miscibility	63-19	
		OMP/EP	3	ABC			(13)		63-18	
		OMP/EP	X	ABC			ļ		63-17	
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9. Registrant Response	8. 11 9	7. Test Substance	•	6. Use	Progress Reports	~~~		5. Study Title	4. Guideline Requirement	
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IFIC -2322	PRODUCT SPECIFIC ID# 36488-RD-2322	J. 0	02 .	salts	and Name Soap	Cose # 4 4083	Ņ	Address YTICAL CORP ATTACK PESTICIDES	1. Company name and Address DELTA ANALYTICAL AGENT FOR: ATTACK 1414 FENWICK I.N	
	is form.	information requested on this form.		ctions and	instruc	et t eche	arefully the	ype or print in ink. Please read carefully the attached instructions and supply the) if necessary.	INSTRUCTIONS: Please type or print in use additional sheet(s) if necessary.	
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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

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Use Categories Key:

K - Residential outdoor

7

Indoor food

- F Aquatic nonfood Industrial A - Terrestrial food crop B - Terrestrial food feed crop
 G - Aquatic monfood residential
- C Terrestrial nonfood crop

 H Greenhouse food crop

 H Indoor nonfood
 - D Aquatic food crop

 I Greenhouse nonfood crop J - Forestry E - Aquatic nonfood outdoor
- N Indoor Medical 0 - Indoor residential

FOOTHOTES: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.

Prod Chem - Regular Chemical

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

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United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE PROPERTY OF print in ink. Please read carefully the attached instructions and supply the information requested on this form. I have and hadress ANALYTICAL CORP FOR PARCY PARTICIDES FOR: ATTACK PESTICIDES FOR: ATTACK PESTICIDES FOR: ATTACK PESTICIDES FOR SPRINGS MD 20910 Frod Chem - Regular Chemical Production Light Composition(1) Descrip of starting saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip of saterials,(1,2) Descrip	ĬĀ.	~		MP/EP		_	ABC					3	٠	I	3-12	~
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Acute Toxic - Regular Chemical				•		<u>-</u> .			7988 355 37 37		: : :
Acute oral toxicity-rat	(1,36,37)					ABC	X	OMP/EP	eg eg	∞	
Acute dermal	(1,2,37)					ABC	Z	OMP/EP			:
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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; data pertaining to the purchased product. [MOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: MP = manufacturing-use product; EP * end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

- Terrestrial food crop Aquatic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic nonfood residential
- C Terrestrial nonfood crop
 H Greenhouse food crop M - Indoor nonfood

E - Aquetic nonfood outdoor J - Forestry

0 - Indoor residentiel

0 - Aquatic food crop N - Indoor Medical

I - Greenhouse nonfood crop

FOOTMOTES: (The following notes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Cham - Regular Chamical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforce *158,180 for enforcement
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental analytical methods (62-3).
- the extent this information is available. If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to
- Data on other end-use products will be required on a case-by-case bosis. For pesticides in the development state, a rudimentary product analytical method and data Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- Required Required if product contains combustible liquids. if product is potentially explosive.
- はおます。 Required if product is a liquid.
- if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- of potential eye and dermal irritation effects. Not required if test material is a gas or highly volatile.

 Not required if test material is corrosive to skin or has pN less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- 8. Required unless repeated dermal exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

lesting of the EP dilution is required if it can be reasonably anticipated that the results of such testing may acet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

The agency has unived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses

Page 1 of 2

	13. Phone Number	13.					tect	12. Name of Company Contact
	11. Date		risent	, and complete. ne, imprisorment	rue, accurate, ishable by fir	nts are to ay be pun	0. Certification certify that the statements made on this form and all attachments are true, accurate, and complete. acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisormen r both under applicable law. ignature and little of Company's Authorized Representative	IO. Certification I certify that the statements I acknowledge that any knowin or both under applicable law. Signature and Title of Compan
mos.	ω φ	MP/EP	33	ABC			pH (9) Oxidizing or reducing action (10)	63-12 63-14
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9. Registrant Response	8. Time Frame	7. Test Substance		6. Use	Progress Reports	F000-10#1	5. Study Fitte	4. Guideline Requirement Mumber
PRODUCT SPECIFIC ID# 36488-RD-2320	3. Date and Type of DCI PRODUCT SPEC: ID# 36488-RD-		lts 36488-31	O SE	and Nam Soa Reg.	2. case # 4083 EPA	TEAL CORP TTACK PESTICIDES LN GS MD 20910	1. Company name and Address DELTA ANALYTICAL C AGENT FOR: ATTACK 1414 FENWICK LN SILVER SPRINGS MD
	on this form.	information requested on this form.	1 "	tions and si	ached instruct	the att	pe or print in ink. Please read carefully the attached instructions and supply the if necessary.	INSTRUCTIONS: Please type or print in Use additional sheet(s) if necessary.
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Page 1 of 2								

United States Environmental Protection Agency Washington, D. C. 20460

Form Approved

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1414 FENWICK LN SILVER SPRINGS MD		in in	EPA	Reg.		No. 3648	36488-31			#01	20400-W2-2220	2320
4. Guideline Requirement	5. Study Title	750×0		Rep	Progress Reports	6. Use Pattern			7. Test		8. Time Frame	9. Registrant Response
Number	•	F00	4	2	u							
63~15	Flamobility (11)	_				ABC	HIJK M		MP/EP		8 mos.	
63-16	Explodability (12)		_		_	ABC			MP/EP			
63-17	Storage stability		<u>. </u>			ABC			AB/EP		8 mog.	
63-18						ABC	M MUTH		OMP/EP			
63-20	Corrosion characteristics					ABC	HIJK M		MP/EP	٠.	8 mos.	
63-21	Dielectric breakdown voltage (15)					ABC		0	EP CONTRACT			**
	Acute Toxic - Regular Chamical				<u></u> ,		٠		7.4			
81-1	Acute oret toxicity-ret (1,36,37)	3 —				ABC			O MP/EP		8 mcs.	
81-2	Acute dermal (1,2,37) toxicity-rabbit/rat					ABC	HIJK		da/dh		8 BOS.	
81-3	Acute imbalation toxicity-rat					ABC			OMP/EP			
81-4	<u>=</u>			_		ABC			OMP/EP	in the second		•
81-5 81-6	Primary dermal irritation (1,2) Dermal sensitization (4)					ABC	HIJK M		OMP/EP		8 HOS.	
	Efficacy - Vertebrate Control Agents .		_	_								
96-19	Browsing animal repellents (1)					ABC	×		EP.		8 Hos.	
Initial to indicate cer	Initial to indicate certification as to information on this page		\vdash		-		P	Date				
(full text of certification is on page one).	ition is on page one).					·						

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables:]; TEP = typical end-use product; data pertaining to the purchased product. (NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key

K - Residential outdoor

<u>.</u>

Indoor food

- A Terrestrial food crop Aquatic nonfood Industrial • 8 - Yerrestrial food feed crop Aquatic nonfood residential
- C Terrestrial nonfood crop
 H Greenhouse food crop M · Indoor nanfood D - Aquetic food crop
- N Indoor Medical I - Greenhouse nonfood crap E - Aquatic nonfood outdoor
 J - Forestry 0 - Indoor residential

FOOTHOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Cham - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sactions: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement enalytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products product analytical method and data that on other end-use product will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product smalytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains combustible liquids. Required if product contains an oxidizing or reducing agent.

- Required if product is potentially explosive.
- **ほまはおニさ** Required if product is a liquid.
- Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- 섫 Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses The agency has usived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

CMB No. 2070-0107

Approval Empires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

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		11. Date		ļ				ł			10. Certification	-
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			EP	×	HIJK	ABC			3	Analytical method	62-3	
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	8 mos.		OMP/EP	3	HIJK	ABC			(1,5)	Preliminary analysis	62-1	
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9. Registrant Response	6. Time	•	7. Test Substance			6. Use	Progress Reports	70-0#T		5. Study Title	4. Guideline Requirement	
					42697-1	No. 426	Reg. N	EPA		GS MD 20910	SILVER SPRIN	T
SPECIFIC 7-RD-2324	PRODUCT SPECIFIC ID# 42697-RD-2324	ID PR			•	salts		4083		AFER INC	DELTA ANALYTICAL AGENT FOR: SAFER	
1	3. Date and Type of DCI							2. Case #	- 2.	7928	. COMPANY name and Address	

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	Washington,	'n, D.	C		20460						ONE No. 2070-0107	1070-0107
	REQUIREMENTS STATUS A	AND R	REGISTRANT'S	STRA	H		RESPONSE				Approval	Approval Expires 12-31-92
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6. Guideline Requirement	5. Study Title	OO#T		Progress Reports		6. Use Pattern		7. Test Substan	7. Test Substance		8. Time Frame	9. Registrent Response
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63-16	Explodebility (12)				No 1944	ABC	HIJK M O	MP/EP		s [†]	8 mos.	Ž.
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63-19	Hiscibility (14)				* ***	ABC	Z	OMP/EP	EP	. 94.		:
63-21	Dielectric breakdown voltage (15)				Page 1	ABC	HIJK M O	EP	EP		8 mos.	: *
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81-1	Acute oral texicity-rat (1,36,37)				Pro .	ABC	HIJK N C	<u> </u>	OMP/EP	## CN 	8 mos.	
81-2	Acute dermal (1,2,37)				<u></u>	ABC	HIJK M C	OMP/EP	/EP		. 8 mos.	
81-3	Acute inhelation toxicity-rat				·	ABC	HIJK M O	N N	EP		8 m 0s.	
81-4	**					ABC	; ;		MP/EP			
81-6	Dermal sensitization (4)		-	-	** *	ABC	HIJK M O		MP/EP		8 mos.	
	Efficacy - Vertebrate Control Agents							٠,				*
96-19	Browsing unimal repellents (1)		······		***	ABC	×	E P			e mos.	
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United States Environmental Protection Washington, D. C. 20460 Agency

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. data pertaining to the purchased product. (MOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.); TEP = typical end-use product; Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

Use Categories Key:

K - Residential outdoor

•

Indoor food

- A Terrestrial food crop Aquatic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic monfood residential
- C Terrestrial nonfood crop
 N Greenhouse food crop
 N Indoor nonfood N - Indoor Medical
 - D Aquatic food crop
 L Greenhouse nonfood crop J - Forestry 'n Aquatic nonfood outdoor

FOOTMOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement enalytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not siready under full scale production and an experimental use permit is being sought.
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- Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. Date on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and date will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- ひょいいょり Required if product is a liquid. if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- Required if end-use product is liquid and is to be used around electrical equipment.

Acute Taxic -Regular Chemical

- Not required if test material is a gas or highly volatile.
- of potential eye and dermal irritation effects. Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as loxicity Category I on the basis
- **%** % Required unless repeated dermal exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pasticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

47 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses

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	79	information requested on this form.	action reques	<u>*</u>	and supply th		instruc	tached	the at	Please read carefully the attached instructions	pe or print in ink. if necessary.	INSTRUCTIONS: Please type or print in Use additional sheet(s) if necessary.
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Approval Expires 12-31-92	REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE
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Form Approved	United States Environmental Protection Agency

81-5 81-4 81-3 81-1 81-2 81-6 Use additional sheet(s) if necessary. 63-21 63-20 63-19 63-18 63-17 63-16 63-15 Humber 4. Guideline 96-19 Requirement Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20 5. Study Title Acute Toxic - Regular Chemical Efficacy - Vertebrate Control Agents Explodability Primary dermal irritation Dielectric breakdown voltage Corrosion characteristics Miscibility Viscosity Storage stability Dermal sensitization Primary eye irritation-rabbit (2) Acute inhelation toxicity-rat Flamability Acute dermal Acute oral toxicity-rat toxicity-rabbit/rat Browsing unimal repellents (1) 20910 (1,2) (15) (13) (12) 3 3 (1,2,37) (1,36,37) 3 2. Case # and Name EPA Reg. No. 4083 Progress Reports Soap salts **ABC** ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC 6. Use Pattern 42697-2 HIJK HIJK HIJK HIJK MLJK MUJK HIJK HIJK HIJK HIJK HIJK HIJK × **33** 33 I OMP/EP 0 0 0 OMP/EP OMP/EP OMP/EP OMP/EP OMP/EP OMP/EP OMP/EP OMP/EP EP MP/EP MP/EP EP Substance 7. Test ... ं PRODUCT SPECIFIC Date and Type of DCI ID# 42697-RD-2325 5. 11m 8 100. 0 0 0 8 mos. œ 00 mos. HOS. mos. **B08** mos. mos. BOS. mos. HOS. mos. HOS. .. Response 9. Registrant

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Date

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

data pertaining to the purchased product.(NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; Key: HP = menufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite Case # and Name: 4083 Soap salts

K - Residential outdoor

F - Aquetic nonfood Industrial · Terrestrial food crop Terrestrial food feed crop
 Aquatic nonfood residential TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

C - Terrestrial nonfood crop

M - Greenhouse food crop

J - forestry E - Aquatic nonfood outdoor

D - Aquatic food crop

L - Indoor food M - Indoor nonfood N - Indoor Medical Greenhouse nanfood crap 0 - Indoor residential

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

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the attached instructions and supply the information requested on this form. 2. Case f and item 4083 Soap Salts EPA Reg. No. 42697-6 The approximation and supply the information requested on this form. ABC HIJK M ONP/EP ABC HIJK M ONP/EP ABC HIJK M ONP/EP ABC HIJK M ONP/EP B mos. ABC HIJK M ONP/EP B mos.	Name of Company Contact
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RESPONSE and supply the information requested on this form.	Case # and Home 4083 Soap sa
REGISTRANT'S RESPONSE	INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and su Use additional sheet(s) if necessary.
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TOL	Washington, D. C. 20460
Protection Agency	States Environmental Protection

Page 2 of :

	s Enviro Washingt	men C	tal D.	ĤO	otect 20460		Agency SPONSE		Form Approved OMB No. 2070-0107	oved 070-0107
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1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER 1414 FENWICK LN SILVER SPRINGS M	L CORP R INC	24 B	Case # 4 083	70 B		ip salts No. 42697-6	7-6	. 34	Date and Type of DCI PRODUCT SPECIFIC ID# 42697-RD-2326	:IFIC -2326
4. Guideline Requirement Number	5. Study Title	000-02 ₹	-	~ 83	Progress Reports	6. Use Pattern		7. Test Substance	8. Ti	9. Registrant Response
		╄	╁	†,	+,	+				
63-16	Flambourty (11)					300	N N N C	MD/FD		
63-17	Storage stability	_	_		_	ABC	大 : 法 :	MP/EP		
63-18	Viscosity (13)					ABC	X	MP/EP		
63-19	₹.			_		ABC	不	OMP/EP	-	14 50 mm
63-21	Corrosion characteristics Dielectric breakdown voltage (15)					ABC	HIJK M C	O RP / EP	8 8 80	
	Acute Toric - Regular Chamical	_			 -	-				
81-1	Acute oral texicity-fat (1,36,37)				_	ABC	HIJK M C	OMP/EP	8 109	
81-2						ABC	3	MP/EP	` .} &	
81-3	Acute inhalation toxicity-rat					ABC	HIJK M C	OMP/EP		
81-4		_				ABC		OMP/EP		A.
81-6	Dermal sensitization (4)					ABC	HIJK M C	OMP/EP	8 100	
	Efficacy - Vertebrate Control Agents						. •			* * * * * * * * * * * * * * * * * * *
96-19	Browning united report cores (1)				_	ABC	*		8 HOS.	*

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

data pertaining to the purchased product.[MOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product; not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; IGAL = technical grade of the active ingredient; PAL = "pure" active ingredient; PALRA = "pure" active ingredient, radiolabeled. Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

K - Residential outdoor

F - Aquatic nonfood Industrial - Terrestrial food crop B - Terrestrial food feed crop G - Aquatic monfood residential

C - Indoor food

C - Terrestrial nonfood crop

M - Greenhouse food crop

E - Aquatic nonfood autdoor

- **H** Indoor nanfood
- - M - Indoor Medical Greenhouse nanfood crap

D - Aquatic food crop

O - Indoor residential J - Forestry

FOOTMOTES: The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chess - Regular Chesical

- product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for cartification of limits (62-2); and *158.180 for enforcement Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for amalytical methods (62-3).
- A schemetic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingradients shall be submitted the extent this information is available.
- Required to support the registration of each manufacturing-use product (including registered TGAis) as well as end-use products produced by an integrated system. Data on other end-use products will be required on a case-by-case basis. will suffice to support an experimental use permit. For pesticides in the development state, a rudimentary product smallytical method and date
- Certified limits are not required for inert ingredients in products proposed for experimental use.
- スチはだこむもら Required if test substances are dispersible with water.
 - Required if product contains an axidizing or reducing agent.
 - Required if product contains combustible liquids.
 - Required if product is potentially explosive.
- Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents. Required if product is a liquid.
- Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- of potential eye and dermal irritation effects. Not required if test material is corrosive to skin or has pH less then 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- Required unless repeated dermal exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for or yanophospates, and may be required for other cholinesterase inhibitors and other pasticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may asset the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. his products are efficacious when used in accordance with tabet directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such

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	13. Phone Humber						ntact	12. Name of Company Contact
							Signature and Title of Company's Authorized Representative	Signature and Title o
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			i i		-	F		10. Certification
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TOS.		MP/EP	HIJK M O	ABC			P. (9)	63-12
		OMP/EP	HIJK M O	ABC	_		Density	63-7
S HOG.		MP/EP	HIJK M O	ABC	•		Odor Control of	63-4
mos.		MP/EP	HIJK M O	ABC			Physical state	63-3
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Response	77	Substance		Pattern	Reports	70-		Requirement
1	8. Time	7. Test		6, Use	Progress	-O#1	5. Study Title	4. Guideline
			42697-7	No. 426	EPA Reg. N	EPA	NGS MD 20910	SILVER SPRI
ID# 42697-RD-2327	ID# 42						K LN C	AGENT FOR: SAFER
PRODUCT SPECIFIC	3. Date and 1 PRODUC			salts	s and Name 3 Soap	4083	TICAL CORP 2.	1. Company name and Address DELTA ANALYTIC
	information requested on this form.	ition request	supply the inform	3	hed instruct	e attac	ype or print in ink. Please read carefully the attached instructions) if necessary.	INSTRUCTIONS: Please type or print in Use additional sheet(s) if necessary.
Approval Expires 12-31-92			RESPONSE		REGISTRANT'S		REQUIREMENTS STATUS AND	
CHE No. 2070-0107					C. 20460		Washington,	-
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1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	Tess ICAL CORP AFER INC	2.	Case # 4083		and Name Soa	Soap	salts				J. pate PROI	Date and Type of DCI PRODUCT SPECIFIC TO # 42687-BD-2327	CIFIC
1414 FENWICK LN SILVER SPRINGS	3		EPA		Reg.		No. 42697-7	7-7					
4. Guideline Requirement	5. Study Title		-ORT		Progress Reports		6. Use			7. Test Substance		8. Time	9. Registrant Response
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63-15	Flummability	(11)					АВС	HIJK M	<u> </u>	da/ah		Som 8	
63-16		(12)					ABC		0	MP/EP		8 1105.	
63-17	Storage stability						ABC	HIJK M	0	OMP/EP		8 mos.	
63-18	Viscosity	(13)					ABC	HIJK	0	MP/EP	•	60	
63-19	Miscibility	(14)					ABC	H NCTH	0	OMP/EP		. :	
63-21	Dielectric breekdown voltage	(15)					ABC	HIJK M	O 0	EP / EF		8 HOG.	÷.
	Acute Toxic - Regular Chemical				•					\$ 15 K			
81-1	Acute oral taxicity-rat	(1,36,37)					ABC	HIJK N	0	OMP/EP	Zi Sign	8 mos.	
81-2	Acute dermal	(1,2,37)					ABC	HIJK M	0			8 208.	
	toxicity-rabbit/ret))) !				
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81-4	Primary eye irritation-rabbit (2)	(2)	_				ABC		0	10/KP	MP/EP) CE	
81-5	primary dermal irritation	(1,2)				•	ABC	HIJK K	2 3 C	OMD/ND			,
	Efficacy - Vertebrate Control Agenta								_				<i>;</i> •
96-19	Browsing united repellents	3					ABC	×	- Inti	EP	·:	8 mos.	
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								-					

footnotes and key definations for guideline requirements

Case # and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. data pertaining to the purchased product. [NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: NP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

K - Residential outdoor F - Aquetic nonfood Industrial

Indoor food

- A Terrestrial food crap 8 - Terrestrial food feed crop
- G Aquetic nonfood residential C - Terrestrial nonfood crap
 N - Greenhouse food crap
 N - Indoor nonfood

- E Aquatic nonfood outdoor
- Greenhouse nonfood crop D - Aquatic food crop N · Indoor Medical 0 - Indoor residentiel J - Forestry

FOOTINGTES: The following notes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chan - Regular Chanical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
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- w If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
- Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudiamntary product analytical method and data will suffice to support an experimental use permit.
- 9 5 Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if product contains an oxidizing or reducing agent. Required if test substances are dispersible with water.
- = 5 Required if product is potentially explosive. Required if product contains combustible liquids.
- Required if product is a liquid.
- あまはお Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- end-use product is liquid and is to be used around electrical equipment.

Acute Taxic - Regular Chemical

- Not required if test meterial is a gas or highly volatile.
- of potential eye and dermal irritation effects. Not required if test material is corrosive to skin or has pit less than 2 or greater than 11.5; such a product will be classified as Toxicity Category 1 on the basis
- 8-Required unless repeated dermal exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS Soap salts

Case ≠ and Name: 4083

Footnotes (cont.):

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37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

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I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisorment 63-4 63 - 363-2 62 - 362-2 62-1 Signature and Title of Company's Authorized Representative or both under applicable law. 63-14 63-12 63-7 61-2 (b) Requirement 4. Guideline INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary. 61-2(a) 12. Name of Company Contact 10. Certification 61-1 Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20 5. Study Title Prod Chem - Regular Chemical Color Descrip of starting materials, (1,2) Oxidizing or reducing action Physical state Certification of limits Preliminary analysis Discussion of formation of Product identity & composition(1) Demaity Amelytical method 200 production & formulation Tapur Ities United States Environmental Protection Agency REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE 20910 Please read carefully the attached instructions and supply the information requested on this form Washington, 3 (1,5) 3,5 (1,3) Case # and Name EPA Reg. No. 4083 Ō. C. 20460 Progress Reports Soap ABC ABC ABC ABC ABC ABC ABC 6. Use salts ABC ABC ABC ABC 42697-10 HIJK HIJK HIJK KIJK MUJK HIJK HIJK HIJK HIJK HIJK HIJK MOND/EP 3 0 OMP/EP OMP/EP OMP/EP OMP/EP OMP/EP 0 0 OMP/EP OMP/EP MP/EP HP/EP MP/EP MP/EP 7. Test Substance 13. Phone Humber Dete 3. Date and Type of DCI PRODUCT SPECIFIC ID# 42697-RD-2328 ζ. 7. 1 9.÷., 00 mos. mos. CHIS No. 2070-0107 Form Approved Approval Expires 12-31-92 mos. **BOS** . HOS. mos. mos. HOS. mos. mos. Page 9. Registrant Response

United States Environmental Protection Agency		
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Washington, D. C. 20460	,	QMB No. 2070-0107
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE	SPONSE	Approval Expires 12-31-92
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the informat Use additional sheet(s) if necessary.	upply the information requested on this form.	form.
1. Company name and Address DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 2. Case # and Name 4083 Soap salts	3. po	Date and Type of DCI PRODUCT SPECIFIC TO A 2507-DD-2128
SILVER SPRINGS MD 20910 EPA Reg. No. 42697-10		
e 5. Study Title 0 Progress 6. Use	7. lest	8
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63-16 Explodability (12) ABC HIJK M ON ABC H	M OMP/EP	8 MOS.
Viscosity (13) ABC HIJK M O	M OMP/EP	8 mos.
Miscibility (14) ABC HIJK M O	3	6
63-21 Dielectric breakdown voltage (15) ABC HIJK M O	X :	8 HOS.
Acute Toxic - Regular Chemical	•	
Acute oral toxicity-rat (1,36,37) ABC HIJK M	*	8 HOS.
81-2 Acute dermat (1,2,37) ABC HIJK M ON	3	8 mos.
efty-rat ABC HIJK M O ABC HIJK M O	M OMP/EP	
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OFFICE SERVICESCOM (5)	nion n one/er a second	
Efficacy - Vertebrate Centrol Agents		
96-19 Browsing animal repellents (1) ABC K	X EP	S MOS
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POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGAI = technical grade of the active ingradient; PAI = "pure" active ingradient; PAIRA = "pure" active ingradient, radiolabeled. data pertaining to the purchased product. [NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does up a manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

Residential outdoor

- A Terrestrial food crop Aquetic nonfood Industriel
- B Terrestrial food feed crop G Aquatic nonfood residential L Indoor food
- C Terrestrial nonfood crop
 N Greenhouse food crop N · Indoor nanfood D - Aquatic food crop N - Indoor Medical
- 1 Greenhouse nonfood crop 0 · Indoor residential E - Aquatic nonfood outdoor
 J - Forestry

FOOTHOTES: (The following notes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chan - teguler Chanical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement
- A schemetic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental analytical methods (62-3).
- w If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available. use permit is being sought.
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product enalytical method and data Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- **あぶこおこちゃゅ** Required if test substances are dispersible with water.
 - Required if product contains combustible liquids. Required if product contains an oxidizing or reducing agent.
 - Required if product is potentially explosive.
 - Required if product is a liquid.
 - Required if product is an amulsifiable liquid and is to be diluted with petroleum solvents.
- Required if end-use product is liquid and is to be used around electrical equipment.

Acute Taxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pM less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermai irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- 8 2 Special testing (acute, subthronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

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Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certifie applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy -**Vertebrate Control Agents**

The agency has valved all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commently accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefite data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary.

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

form Approved QMB No. 2070-0107 Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.	pe or print in ink. Please read carefully the attached instructions and supply the if necessary.	efully th		65		CTE C	ions and su		3	5	information requested on this form.	m this form.		
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	TOAL CORP		2. Case #	Case # . 4083	3	Soap	salts					3. Date and Type of DCI PRODUCT SPECIFIC	SPECI	FIC
1414 FENWICK LN SILVER SPRINGS MD			E)	EPA	Reg. No.	. N		42697-11				ID# 42697-RD-2329	97-RD-	·2329
4. Guideline Requirement	5. Study Title		O-ORT		Progress Reports	ress rts	6. Use Pattern			8.7	7. Test Substance	8. Time frame	i p	9. Registrant Response
Humber			-00		2	3			1					
	Prod Chem - Regular Chemical	:									ļ			
61-1	Product identity & composition(1)	J					ABC	HIJK	X	3	OMP/EP	8	mos.	
61-2(a)	Descrip of starting materials, (1,2)	1,2)					ABC	HIJK	*	E	OMP/EP	80	mos.	
	production & formulation													
•	proc						1			<u>' </u>) 			
61-2(b)	Discussion of formation of ((1,3)					ABC	HLJK	3		OMP/EP	œ	BOS.	
62-1	analysis	3.					ABC	HLJK	3	<u>0</u>	MP/EP	8 =	mos.	
62-2	<u>=</u>	(1,5)	_				ABC	HIJK	X	OMP/	P/EP	80 =	mos.	
62-3	Analytical method (3					ABC	HIJK	X	OMP/		8 1	mos.	
63-2	Color		_				ABC	HIJK	X	OMP/		- 0	BOS.	
63-3	Physical state						ABC	HIJK	3	OMP/		- 00	mos.	
63-4	Odor						ABC	HIJK	3	OMP/	P/EP		mos.	
63-7	Density		_		_		ABC	HIJK	3	OMP/	P/EP	- 8	BOS.	
63-12	P	9					ABC	MLIK	X	OMP/	P/EP		BOS.	
63-14	Oxidizing or reducing action ((10)					ABC	HIJK	3	<u>O</u>	MP/EP		mos.	

or both under applicable law.

12. Name of Company Contract

Signature and Title of Company's Authorized Representative

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment

11. Date

13. Phone #umber

10. Certification

United States Environmental Protection Agency REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE Washington, D. C. 20460

Form Approved OMB No. 2070-0107 Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.

Use additional sheet(s) if necessary.

							_	_	_	_	_	_	_		**	_			_
96-19 Browsing animal repellents (1)		81-5	81-3	81-2	81-1		63-21	63-20	63-19	63-18	63-17	63-16	63-15	Rustber	Requirement	6. Guideline	SILVER SPRIN	DELTA ANALYTICAL AGENT FOR: SAFER	Company name and Address
Browsing animal repellents (1)	Efficacy - Vertebrate Control Agents	tion .	Primary eye irritation-rabbit (2)		oxicity-rat	Acute Toxic - Reguler Chemical	Dielectric breakdown voltage (Corrosion characteristics	₹		Storage stability	Explodability (Flammability			5. Study Title	GS ND 20910	AFER INC	
3		(1,2)	2	0,2,30	(1,36,37)		(15)		3	(13)		(12)	3						
<u> </u>				· · · · · · · · · · · · · · · · · · ·														:	2. Case # and Name
<u> </u>										***************************************			· ····································		∽ ~		EPA	4083	
															20 ·	P		ω :	*
														2	Reports	Progress	Reg.	So	
														u	ts:	229	No.	Soap	ŧ
ABC		ABC	ABC) D	ABC		ABC	ABC	ABC	ABC	ABC	ABC	ABC			6. Use		salts	
*		HIJK	HIJK	אַרַזַּמ	HIJK		HIJK	HIJK	HIJK	HIJK	HIJK	HIJK	HIJK				42697-11		
		X					X	*	*			X	X						
EP		<u>0 0</u>	O (OEP	읖	<u>은</u>	읖	<u>유</u>	윤	<u>~</u>	\vdash	· .	,			
P	!	OMP/EP	OMP/EP	OMB/ED	OMP/EP	•	סי	OMP/EP	OMP/EP	OMP/EP	OMP/EP	OMP/EP	MP/EP		ettern Substance	Test			
						-									77.0			PROD	3 Date 8
8 mos.		8 mos.					8 mos.	8 mos.	8 mos.	8 mos.	8 mos.	8 mos.	8 mos.		Frame	a. rips		PRODUCT SPECIFIC ID# 42697-RD-2329	Type of D
															Response	9 Registrant		:: ::IFIC)2329	7

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

data pertaining to the purchased product INOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not be purchased, and any use for the product does not be purchased. TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; Key: MP a manufacturing-use product; EP a end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cit

Use Categories Key:

K - Residential outdoor

- F Aquatic nonfood Industrial A - Terrestrial food crop
- 8 Terrestrial food feed crop 6 Aquatic monfood residential L - Indoor food C - Terrestrial nonfood crop
 N - Greenhouse food crop
 N - Indoor nonfood
 - D Aquatic food crop
- ! Greenhouse nonfood crop! Indoor Medical • E - Aquatic nonfood outdoor
- 0 Indoor residential Forestry

FOOTDOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Cham - Regular Chamical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.160 for enforcement discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.173 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
- If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- Required to support the registration of each manufacturing use product (including registered IGAIs) as well as end-use products produced by an integrated system. the extent this information is available.
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- 52222605 Certified limits are not required for inert ingredients in products proposed for experimental use.
 - Required if test substances are dispersible with water.
 - Required if product contains an oxidizing or reducing agent.
 - Required if product contains combustible liquids.
 - lequired if product is potentially explosive.
 - Required if product is a liquid.
- if product is an emulsifiable liquid and is to be diluted with petroleum solvents. if and-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- 썱 Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protucals and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrents should consult with the agency for development of protocols and methodology

37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with tabel directions and commenty accepted pest control practices. The registrant must develop and maintain The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary.	pe or print in ink. Please read carefully the attached instructions and supply the if nacessary.	the	å	2	5	Str.	ctio	and sur		nfo	1	on reques	information requested on this form.	orm.	
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	APER INC	?	Case # 4083		, <u>\$</u>	and Name Soap	70	salts					3. Date PRO	Date and Type of OCI PRODUCT SPECIFIC ID# 42697-RD-2330	CIFIC
1414 FENWICK L SILVER SPRINGS	GS MD 20910		EPA		Reg.	1	No.	. 42697-13	7-13						1
4. Guideline Requirement	5. study Title		0-0×1		Pro Pro	Progress Reports		6. Use Pattern			40.01	7. Test Substance		8. Time Frame	9. Registrant Response
Number			6		2		3								
	Prod Chem - Regular Chemical					······································									
61-1	Product identity & composition(1)							ABC	HIJK	X	<u>o</u>	OMP/EP		8 mos.	<u> </u>
61-2(a)	Descrip of starting materials, (1,2) production & formulation							ABC	HIJK	X	<u> </u>	OMP/EP	•	8 mos.	
	proc														 ,-
61-2(b)	Discussion of formation of (1,3)							ABC	HIJK	3	<u>-</u> 2	OMP/EP		8 mos.	
63-1	repurities							ARC	NT.JK		<u> </u>	MP/EP	•	8 mos.	
62-2	<u>:</u>		-					ABC	HIJK	X	읖	MP/EP		8 mos.	
62-3								ABC	HIJK		2	MP/EP		8 mos.	_
63-2	Color							ABC	HIJK	3	읖	MP/EP		8 mos.	
63-3	.Physical state							ABC	ACIH		2	MP/EP		8 mos.	
63-4	Odor							ABC	HIJK			MP/EP			
63-7	Density							ABC	HIJK		2	MP/EP			
63-12	P# (9)							ABC	MUJK	X	2	MP/EP		8 mos.	_
63-14	Oxidizing or reducing action (10)							ABC	HIJK	3	0	MP/EP		8 mos.	
10. Certification I certify that the state	 Certification certify that the statements made on this form and all attachments are true, accurate, and complete. acknowledge that any knowledge false or misleading statement may be punishable by fire. imprisonment 		5	S 6	5 80 E	7 5	7	and complet	ent e				11. Date		
	of the state of th														
12. Hame of Company Cont			Ш	Ш						-			13. Phone Kumber	xer	
12. Waste of Company Contact	COCC														

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB No. 2070-0107
Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.

Use additional aheet(s) if necessary.

				İ									
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	TCAL CORP		Case # 4083		and Name SOA	Soap	salts				J. Date a PROD	Date and Type of DCI PRODUCT SPECIFIC TO# 42697-RD-2330	IFIC
SILVER SPRIN	GS MD 20910		EPA		Reg.	No.	. 42697-13	7-13					
4. Guideline Requirement	5. Study Title		O-10×1		Progress Reports	889	6. Use Pattern			7. Test Substance	7.0	8. Time frame	9. Registrant Response
Number			-00	1	2	3							
63-15	Flamability	3					ABC	HIJK M	0	MP/EP		8 mos.	
63-16		(12)	_		_		ABC			OMP/EP		_	
63-17	Storage stability						ABC	HIJK M	0	MP/EP		8 mos.	
63-18		(13)	_				ABC	HIJK K		OMP/EP		8 mos.	
63-19	₹	(35)					ABC	HIJK K		MP/EP		8 mos.	
63-20	Corrosion characteristics						ABC	HIJK M		OMP/EP		8 mos.	
63-21	Dielectric breakdown voltage i	(15)					ABC	HIJK M	0	EP .		8 mos.	
	Acute Toxic - Regular Chemical						-						
81-1	Acute oral toxicity-rat	(1,36,37)					ABC	HIJK M		OMP/EP		8 mos.	
81-2	Acute dermal	(1,2,37)			,		ABC	HIJK		OMP/EP		8 mos.	
81-3	Acute inhalation toxicity-rat						ABC	H NUK H	0	MP/EP		8 mos.	
81-4	Primary eye irritation-rabbit (2)	(2)					ABC	HIJK K		OMP/EP		8 mos.	
81-5	Primary dermal irritation ((1,2)					ABC	H NCIH		OMP/EP		8 mos.	
81-6		3					ABC	HIJK M		OMP/EP		8 mos.	
	Efficacy - Vertebrate Control Agents												
96-19	Browsing animal repellents	3					ABC	*		EP		8 mos.	
Initial to indicate certification as to info	indicate certification as to information on this page	is page	F					D.	Date				
													A to this inches to the same t

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

data pertaining to the purchased product. (NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.); IEP = typical end-use product; IGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

K - Residential outdoor

F - Aquatic monfood Industrial Terrestriel food crop B - Terrestrial food feed crop G - Aquatic nonfood residential Aquatic nonfood residential

L · Indoor food

C - Terrestrial monfood crop

N - Greenhouse food crop

M - Indoor nonfood

- D Aquatic food crop N - Indoor Medical 1 - Greenhouse nonfood crop
 - E Aquatic nonfood outdoor
 J Forestry
- 0 Indoor residential

FOOTDOTES: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental If the posticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to use permit is being sought.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products produced by an integrated system. the extent this information is available.
- Date on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- == Required if product contains combustible liquids.
- Required if product is potentially explosive.
- product is a liquid.
- if product is an amulaifiable liquid and is to be diluted with petroleum solvents. If and-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test anteriol is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- * Required unless repeated dermal exposure does not occur under conditions of use.

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Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticidos which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Washington, D. C. 20460 **Protection Agency**

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agenta

The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and stunks) that may directly or indirectly transmit diseases to humans. However, each registrant must develop and maintain his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain or benefits duta in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

OMB No. 2070-0107

Approval Expires 12-31-9;

INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary. Please read carefully the attached instructions and supply the information requested on this form.

4. Guideline Requirement 63-7 63-4 63-3 63-2 62 - 362-2 61-1 I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 62-1 61-2(b) 61-2(a) or both under applicable law. 63-14 63-12 10. Certification Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20 <u> Prod Chem - Regular Chemical</u> 5. Study Title Certification of limits Discussion of formation of Descrip of starting materials, (1,2) Product identity & composition(1) Oxidizing or reducing action Demsity Physical state Cotor Analytical method Preliminary analysis 8 production & formulation impurities 20910 30 (1,5) (1,3) 3 (3,5) 2. Case # and Name 4083 EPA Reg. No. 42697-15 Progress Reports Soap salts ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC 6. Use MUIN ALTH HIJK HIJK HLJK MUJK HIJK HIJK HIJK (M OMP/EP 3 X OMP/EP 0 0 OMP/EP OMP/EP OMP/EP OMP/EP 0 0 MP/EP MP/EP MP/EP MP/EP Substance 7. Test 11. Date 3. Date and Type of OCI PRODUCT SPECIFIC ID# 42697-RD-2331 7. Time ∞ ∞ ∞ ∞ **00 00** 00 8 8 80 80 mos. mos. mos. mos. 30 S mos. mos. BOS mos. mos. mos. Response 9. Registrant

Signature and Title of Company's Authorized Representative

13. Phone Number

12. Name of Company Contact

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

use acultional sheet(s) if necessary.	ir necessary.											
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	TEST TOORP	Ņ	_	Case # 4083	5	Soap	salts				3. Date and Type of DCI PRODUCT SPECIFIC TO \$ 12607-BD-233	and Type of DCI DUCT SPECIFIC A2607-BD-2331
1414 FENWICK IN SILVER SPRINGS	IN GS MD 20910		四	EPA	Reg.	. No.	D. 42697-15	7-15				
6. Guideline Requirement	5. Study Tirle	:	-027		Progres	Progress Reports	6. Use Pattern			7. Test Substance	8. Time	9. Registrant Response
tiumber			200	-	~	u	•					
63-15	flamability	(11)					ABC	HIJK	X	OMP/EP	8 mos	•
63-16	Explodability	(12)					ABC	HLIK	3	-	8 mos	•
63-17	Storage stability						ABC	HIJK	*	OMP/EP	8 mos	•
63-18	Viscosity	(13)					ABC	HIJK	*	OMP/EP	8 mos	•
63-19	Miscibility	(1)					ABC	HIJK	*	OMP/EP	8 mos.	•
63-20	Corrosion characteristics						ABC	HLJK	3	OMP/EP	8 mos.	•
63-21	Dietectric breakdown voltage	(15)					ABC	HIJK	X	OEP	8 mos	•
	Acuts Toxic - Requier Chesical											
81-1	Acute oral toxicity-rat	(1,36,37)					ABC	HIJK	**	OMP/EP	8 mos	-
81-2	Acute dermet	(1,2,37)					ABC	HIJK	3	OMP/EP	8 mos.	_
81-3	Acute inhelation toxicity-rat						ABC	ALIH	=	OMP/EP	8 mos	•
81-4	Primary eye irritation-rabbit (2)	(2)					ABC	MUJK	三	OMP/EP	8 mos.	•
81 - 5 81 - 5	Primary dermal irritation Dermal sensitization	(1,2)					ABC	XCIH XCIH		OMP/EP	8 mos.	-
	Efficacy - Vertebrate Control Agents	Rents										
96-19	Browsing animal repellents	3					ABC	*		EP P	8 mos.	•
initial to indicate ceri	initial to indicate certification as to information on this page	his page		T	}			0	ate			
(full text of certification is on page one).	tion is on page one).	1										

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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Use Categories Key:

K - Residential outdoor

- Aquatic nonfood Industrial Terrestrial food crop
- Ferrestrial food feed crop
 Aquatic nonfood residential L - Indoor food C - Terrestrial nonfood crop N - Greenhouse food crop M - Indoor nonfood

Greenhouse food crop

- 0 Aquatic food crop
- W Indoor Medical 1 - Greenhouse nonfood crop J - Forestry
 - E Aquatic nonfood outdoor

POOTROTES: The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement enelytical methods (62-3).
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- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- 3737**3**50,5 Required if product is potentially explosive. Required if product contains combustible liquids.
 - Required if product is a tiquid.
 - if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- ۶ **۲** Special testing (acuse, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and muthodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Footnotes (cont.):

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Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certific applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

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United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

048 No. 2070-0107

Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

	•													
1. Company rate and Address DELTA ANALYTICAL AGENT FOR: SAFER	dress FICAL CORP SAFER INC	2. 0.	Case # . 4083	and News	Soap Soap	salts					3. Da		PRODUCT SPECIFIC	IFIC
1414 PENWICK LA SILVER SPRINGS	NGS MD 20910	<u> </u>	EPA I	Reg.	No.		42697-16				107		42037 ND-2332	6336
4. Guideline Requirement	5. Study Title	0-0-7		Progress Reports	889	6. Use Pattern			ş ?	7. Test Substance		8. Ti	8. Time Frame	9. Registrant Response
Humber	•		-	~	ш							-		-
	Prod Chest - Rosular Chessical													
61-1	Product identity & composition(1)		_			ABC	HIJK		OMP/EP	EP			8 mos.	
61-2(a)	Descrip of starting materials,(1,2)					ABC	HIJK	X	OMP/EP	/EP			8 mos.	
	procession a romanación								· · ·					
61-2(b)	Discussion of formation of (1,3)					ABC	HIJK	X	OMP/EP	/EP			8 mos.	
,	ispurities		_							•	-			
62-1	Proliminary analysis (1,4)					ABC	HIJK		OMP	MP/EP			8 mos.	
62-2	Certification of limits (1,5)					ABC	HIJK		OMP/EP	/EP			8 mos.	
62-3	Analytical method (1)		-			ABC	HIJK		OMP/EP	/EP			8 mos.	
63-2	color	_				ABC	HIJK		OMP/	/EP			8 mos.	
63-3	. Physical state					ABC	HIJK	X	OMP/	/EP			8 mos.	· · · · · · · ·
63-4	Odor					ABC	ALIA	•	OMP/	EP			8 mos.	
63-7	Density					ABC	HIJK		OMP/EP	/EP			8 mos.	-
63-12	P# (9)					ABC	HIJK			/EP				
63-14	Oxidizing or reducing action (10)				_	ABC	HIJK	X	OMP/	/EP			8 mos.	
10. Certification			İ						-	=	11. Date			
I certify that the statements I acknowledge that any knowin or both under applicable law.	I certify that the statements made on this form and all attochments are true, accurate, and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	be pu	nishai	accur ble by	rate,	and comple , imprison	te, tent							
Signature and Title of	Signature and Title of Company's Authorized Representative													
12. Hame of Company Contact	ntact									_	1 W Ohan Milder			

ONB No. 2070-0107 form Approved

United States Environmental Protection Agency Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Approval Expires 12-31-92

the second secon									
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER 1414 FENWICK IN SILVER SPRINGS MD	CAL CORP FER INC IN S MD 20910	.2	Case # and 4083 EPA Re	soap s Soap s	salts	7-16		3. Date and Type of DCI PRODUCT SPECID# 42697-RD	Date and Type of DCI PRODUCT SPECIFIC ID# 42697-RD-2332
4. Guideline Requirement	5. Study Title		20-0×0 2 7	Progress Reports	6. Use Pattern		7. Test Substance	8. Time	e 9. Registrant
Haber			-1	2 3					
63-15	Flamability	(11)			ABC	и устн	OMP/EP	8 1	mos.
63-16	Explodability	(12)			ABC				mos.
63-17	Storage stability				ABC	HIJK M	OMP/EP		mos.
63-18	Viscosity	(13)			ABC	HIJK M	OMP/EP	6 0	mos.
63-19	Miscibility	3			ABC		OMP/EP	60	mos.
63-20	Corrosion characteristics				ABC	HIJK M	MP/	œ	mos.
63-21	Dielectric breakdown voltage	• (15)			ABC	HIJK M	0 EP	· 66	mos.
	Acute Toxic - Regular Chemical							•	
81-1	Acute oral toxicity-rat	(1,36,37)			ABC	HIJK M	OMP/EP		mos.
81-2	Acute dermal	(1,2,37)			ABC	HIJK M	OMP/EP		mos.
81-3	Acute imalation toxicity-rat	7			ABC		OMP/EP	-	mos.
81-4	Primary eye irritation-rabbit (2)	it (2)			ABC		OMP/EP		mos.
81 - 6	Primary dermal irritation Dermal sensitization	(1,2) (&)	• • • •		ABC	HIJK M	OMP/EP	œ o	
	Efficacy - Vertebrate Control Agents	Agents	-						
96-19	Browsing enimal repellents	3			ABC	*	EP	& 	mos.
Initial to indicate certification as to information on this page	ification as to information on	this page				Date	-		

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite data pertaining to the purchased product.[NOTE: if a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGAL = technical grade of the active ingredient; PAL = "pure" active ingredient; PALRA = "pure" active ingredient, radiolabeled.

Use Categories Key: A - Terrestrial food crop

K - Residential outdoor

- F Aquetic nonfood Industrial
- B Terrestrial food feed crop
 G Aquatic nonfood residential L -. Indoor food C - Terrestrial nonfood crop

 H - Greenhouse food crop

 M - Indoor nonfood
 - D Aquatic food crop
 - Aquatic nonfood outdoor
- N Indoor Medical Greenhouse nonfood crop

POOTNOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.180 for enforcement discussion of formation of limits (62-2); and *158.180 for enforcement Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for analytical methods (62-3).
- A achemetic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products produced by an integrated system. If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
- will suffice to support an experimental use permit. Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- ままはおニ6
 - Required if product is a liquid.
- if product is an emulsifiable liquid and is to be diluted with petroleum solvents. If end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chamical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pM less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- Required unless repeated dermal exposure does not occur under conditions of use. of potential eye and dermal irritation effects.
- 8. Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticidos which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocots and methodology

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary.

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

12. H	or bo signa	I cer		63-12	63-7	63-4	63-3	63-2	62-3	62-2	62-1		61-	-	•	61-	61-1			Requi	SF	.>□.	T
12. Mame of Company Contact	or both under applicable law. Signature and Title of Company	certification ertify that the state cknowledge that any k	14	12	7		ω ·		<u></u>	2	<u> </u>		61-2(b)		,	61-2(a)	μ			4. Guideline Requirement	ILVER SPRINGS	Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	
tact	or both under applicable law. Signature and Title of Company's Authorized Representative	10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment	Oxidizing or reducing action (10)	P# (9)	Density	Odor	· Physical state	color	Analytical method (1)	Certification of limits (1,5)	Preliminary analysis (1,4)	impurities	Discussion of formation of (1,3)	proc	production & formulation	Descrip of starting materials, (1,2)	Product identity & composition(1)	Prod Chen - Regular Chemical		5. Study Title	GS ND 20910	TEST ICAL CORP	
		may be p	_																		_	2	1
		enisha	-			_						_			•				-	~~~	EPA	Case # 4083	
		e br				_			-			-		_		_			~	Progress Reports	Reg.	Soa	
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		and complet	ABC	ABC	ABC	ABC	ABC	ABC	ABC	ABC	ABC		ABC			ABC	ABC			6. Use Pattern	. 42697-22	salts	
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			/EP	OMP/EP	MP/EP			/EP	/EP	MP/EP	MP/EP		da/amo		•	OMP/EP	OMP/EP			7. Test Substance			
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13. Phone Number			?														•					, in	
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Ä			~		8	8	8	8	8	8			8			8	8			8. Time Frame		UCT 426	
			mos.	mos.	mos.	mos.	mos.	mos.	mos.	mos.	mos.		mos.			mos.	mos.					Date and Type of DCI PRODUCT SPECIFIC ID# 42697-RD-2333	
																				9. Registrant Response		 IFIC -2333	

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
ONB No. 2070-0107

Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary. Please read carefully the attached instructions and supply the information requested on this form

81-1 81-2 81-5 81-4 81-3 63-20 63-19 63 - 1863-17 63-16 Requirement 81-6 63-15 4. Guideline 96-19 63 - 21Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20 5. Study Title Acute Toxic - Regular Chemical Efficacy - Vertebrate Control Agents Dielectric breakdown voltage Storage stability Explodability Flamability Primary dermal irritation Primary eye irritation-rabbit (2) Corrosion characteristics **Hiscibility** Viscosity Dermal sensitization Acute inhalation toxicity-rat Acute dermal Acute oral toxicity-rat toxicity-rabbit/ret Browsing animal repellents (1) 20910 (1,2) 35 (12) 3 E (1,2,37)(1,36,37) 35 (13) Case # and Name 000 4070 EPA Reg. 4083 Reports Progress Soap N No. salts ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC 6. Use 42697-22 XCIH XCIH MUJK HIJK HIJK HIJK HIJK HIJK HIJK HIJK HIJK HIJK HIJK ㅈ **3333 33** X X **XXXX** 00 0 0 0 0 0 0 0 0 0 0 0 MP/EP MP/EP MP/EP MP/EP MP/EP EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP EP 7. Test Substance PRODUCT SPECIFIC Date and Type of DCI ID# 42697-RD-2333 8. Time Frame œ **@** @ @ @ 20 00 0 ∞ 8 ∞ œ MOS mos BOS mos. mos Bos mos. mos mos BOS mos Bog MOS 9. Registrant Response

(full text of certification is on page one).

Initial to indicate certification as to information on this page

Date

United States Environmental Protection Washington, D. ဂ 20460 Agency

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite data pertaining to the purchased product. [NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product;

Use Categories Key:

- K Residential outdoor - Aquatic nonfood Industrial - Terrestrial food crop B - Terrestrial food feed crap
 G - Aquatic nonfood residential L - Indoor food C - Terrestrial monfood crop
 H - Greenhouse food crop M - Indoor nonfood
- D Aquatic food crop N - Indoor Medical Greenhouse nonfood crop
- E Aquatic nonfood outdoor J Forestry 0 - Indoor residential

FOOTMOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chan - Regular Chanical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materiats and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *150.180 for enforcement
- A schemetic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought. enelytical methods (62-3).
- If the pasticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products product so integrated system.

 Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- スポニスニ さ Required if product is a liquid. Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- N -Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis Not required if test material is a gas or highly volatile.
- Required unless repeated dermal exposure does not occur under conditions of use. of potential eye and dermal irritation effects.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affec. the visual system. Registrants should consult with the agency for development of protocols and methodology

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS Case ≠ and Name: 4083

Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

¥ prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certifications specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain

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United States Environmental Protection Agency Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Please read carefully the attached instructions and supply the information requested on this form Approval Expires 12-31-92

61-1 63-7 63-4 63-3 63-2 62-3 62-2 62-1 Signature and Title of Company's Authorized Representative or both under applicable less. I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment 63-12 61-2 (b) 61-2(a)Requirement 4. Guideline DISTRUCTIONS: Please type or print in ink.
Use additional sheet(s) if macessary. 12. Name of Company Cont.ct 63-14 10. Certification Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20 5. Study Title Prod Chan - Resuler Chanical Descrip of starting meterials,(1,2) Oxidizing or reducing action (10) Dents i ty Physical state 500 Analytical method Certiffication of limits Preliminary analysis Discussion of formation of Product identity & composition(1) ğ production & formulation impurities 20910 (1,5) (1,3) 3,5 3 3 2. Case # and Name 4083 ***** EPA Reg. No. 42697-33 Progress Reports ~ Soap salts 6. Use ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC HIJK M MLJK HIJK ALIH HLJK KLIK HIJK HIJK MUJK 3 3 I Z OMP/EP 0 0 0 0 0 0 0 OMP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP Substance 7. Test 13. Phone Number 11. Date PRODUCT SPECIFIC ID# 42697-RD-2334 Date and Type of DCI F. 7. ∞ 8 œ 8 œ œ 00 œ **60 60** mos. BOS mos. mos. MOS BOS SOE mos. BOE mos **BOS** Response 9. Registrant

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if nacessary.

Use additional sheet(s) if nacessary.	if nacessary.			l							,			
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	CORP	Ņ	Case # 4083	Case # 4083	5	SE	Soap	salts	•			3. Date at PRODI	Date and Type of DCI PRODUCT SPECIFIC TO# A3687-BD-2334	IFIC
SILVER SPRING	3S MD 20910	_	EPA	7	Reg.	<u>ق</u>		No. 426	42697-33					4
4. Guideline Requirement	5. Study Title		0-0-7		# T	Progres Reports	Progress Reports	6. Use Pattern			7. Test Substance	7.00	8. Time Frame	9. Registrant Response
Number				-		2	2							
63-15	Florensbillty . (11)							ABC	HIJK	0	MP/EP		8 mos.	
63-16	pdability	_	_					ABC	HIJK M	0	MP/EP		8 mos.	
63-17	Storage stability		_		_			ABC	HIJK M	0	MP/EP		8 mos.	
63-18	Viscosity (13)							ABC	HIJK M	0	MP/EP		8 mos.	
63-19	Miscibility (14)							ABC			MP,		8 mos.	
63-20	Corrosian characteristics							ABC	HIJK M	0	MP/EP		8 mos.	
63-21	Dielectric breakdown voltage (15)							ABC	HIJK K	0	EP		8 mos.	
	Acute Toxic - Regular Chemical													
81-1	Acute oral toxicity-rat (1,36,37)				_			ABC	HIJK M		OMP/EP		8 mos.	
81-2	Acute dermit (1,2,37)		•					ABC	HIJK M		OMP/EP		8 mos.	
81-3	Acute inhelation toxicity-rat							ABC	M ACIH		OMP/EP		8 mos.	
81-4	Primary eye irritation-rabbit (2)							ABC			OMP/EP		8 mos.	
81-5	etion				_			ABC	M ACIH		OMP/EP		e mos.	
81-6	Dermal sansitization (4)							200	מיכות		10 / 10 F		- TOD:	
	Efficacy - Vertebrate Control Agents													
96-19	Browsing enimal repellents (1)							ABC	*		EP		8 mos.	
This is indicate care	trivial to indicate certification as to information on this page		-		\vdash		Γ	ŀ	Date	<u>- ا</u>				
(full text of certification is on page one).	ion is on page one).													
•					l									

United States Environmental Protection Washington, D. C. 20460 Agency

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

data pertaining to the purchased product.[NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.); TEP = typical end-use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cita

Use Categories Key

- F Aquatic manfood Industrial Terrestrial food crap Residential outdoor Terrestrial food feed crop
 Aquatic nonfood residential L - Indoor food
- C Terrestrial nonfood crop

 " Greenhouse food crop N - Indoor nonfood

-

- D Aquatic food crop Indoor Medical Greenhouse nonfood crop
- E Aquatic nonfood outdoor 0 - Indoor residential J - forestry

FOOTMOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: +158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforce enelytical methods (62-3). *158.175 for certification of limits (62-2); and *158.180 for enforcement
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
- If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data Required to support the registration of each menufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- なまはおニ さっぴ Required if test substances are dispersible with water.
 - Required if product contains an oxidizing or reducing agent.
 - Required if product contains combustible liquids.

 - Required if product is patentially explosive. Required if product is a liquid.
- if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.

 Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides. have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and mothodology

United States Environmental Protection Washington, D. C. 20460 Agency

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 prior to initiation of studies.

Testing of the EP ditution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certific applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

or benefite data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case by case basis (e.g., significant new uses his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such

The Agency has determined that submission of efficacy data is required to support the claims made for products claimed to repel verebrate animals.

Page 1 of

REQUIREMENTS United States Environmental Protection Agency Washington, STATUS AND REGISTRANT'S RESPONSE D. ဂ 20460

OMB No. 2070-0107 Form Approved Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Use additional sheet(s) if necessary. Please read carefully the attached instructions and supply the information requested on this form.

4. Guideline Requirement 62-2 63-4 63-3 63-2 62-3 61-1 63-7 62-1 61-2(b) 61-2(a) 63-14 63-12 10. Certification Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20 5. Study Title <u> Prod Chem - Regular Chemical</u> Certification of limits Descrip of starting materials, (1,2) Oxidizing or reducing action Demaity Physical state 50105 Analytical method Preliminary enalysis Discussion of formation of Product identity & composition(1) 8 production & formulation impurities 20910 3 (2,5) (1,4) (1,3) 3 2. Case # and Name EPA Reg. No. 4083 Reports Progress ~ Soap salts ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC ABC 6. Use Pettern 42697-34 HIJK M **HIJK** HIJK ACIH HIJK HIJK HIJK HIJK HIJK HLJK ******* X OMP/EP 0 OMP/EP 0 0 0 0 OMP/EP 0 0 0 0 MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP MP/EP Substance 7. Test 11. Date 3. Date and Type of DCI PRODUCT SPECIFIC ID# 42697-RD-2335 8. Time œ 8 00 8 8 ∞ mos mos. mos. mos BOS mos. mos. mos mos. mos Mos Response 9. Registrant

- or both under applicable law. certify that the statements made on this form and all attachments are true, accurate, and complete acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment

Signature and Title of Company's Authorized Representative

12. Name of Company Contact

13. Phone Humber

United States Environmental Protection Agency Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
ONB No. 2070-0107
Approval Expires 12-31-92

IMSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.

and empirished sheet (2) is there	it imcassery.		ĺ				ĺ								
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	CAL CORP	2.	2.4	Case # 4 083	3	and Name Soap		salts					3. Date an PRODU	Date and Type of OCI PRODUCT SPECIFIC TO# 42697-RD-2315	IFIC
SILVER SPRINGS	IN 3S MD 20910		西	EPA	Reg.		No.	. 42697-34	7-34		l I				8 6 6
4. Guideline Requirement	5. Study Title		0 -0× 7		2 7	Progress Reports		6. Use Pattern			40 PJ	7. Test Substance	- G	8. Time Frame	9. Registrant Response
Humber			-00	**	2	3									
63-15	flamability (11)			_				ABC	HIJK I		<u>3</u>	MP/EP		8 mos.	
63-16	Explodability (12)				-		_	ABC	HIJK I	7	2	MP/EP		8 mos.	
63-17	Storage stability		_		_		_	ABC	HIJK 1		읖	MP/EP		8 mos.	
63-18	Viscosity (13)						_	ABC	HIJK I	3	9	MP/EP		8 mos.	
63-19	Alacibility (14)		_					ABC			2			8 mos.	
63-20	Corrosion characteristics						_	ABC	HIJK	×	OMP/	P/EP	_	8 mos.	
63-21	Dielectric breakdown voltage (15)						<u> </u>	ABC	HIJK	Z	0	EP .		8 mos.	
	Acute Toxis - Reguler Chemical			•											
81-1	Acute oral toxicity-ret (1,36,37)	5		•			_	ABC	HIJK I		풀	OMP/EP		8 mos.	
81-2		J				<u>·</u>		ABC	HIJK	×	===	OMP/EP		8 mos.	
81-3	Acute inhelation toxicity-rat						_	ABC			읖	MP/EP		8 mos.	
81-4	Primary eye irritation-rabbit (2)							ABC			<u> </u>	OMP/EP	,		
81-5	etion						_	ABC		X X	3	OMP/EP	=		
81-6	Dermal sansitization (4)						_	ABC	TION I		-	Ont / ar		0 III CU.	
	Efficacy - Vertebrate Control Agents														
96-19	Browsing animal repellents (1)							ABC	*		য	EP		8 mos.	
	The state of the s			广	\vdash	\vdash	\vdash		0	Date	┢				
(full text of certification is on page one).	Initial to indicate certification as to information on this page (full text of certification is on page one).	7								:					

United States Environmental Protection Agency ဂ 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Key: NP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or city data pertaining to the purchased product. (NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.); IEP = typical end-use product; TGAL = technical grade of the active ingredient; PAL = "pure" active ingredient; PALRA = "pure" active ingredient, radiolabeled.

Terrestrial food crop

K - Residential outdoor

-

Indoor food

- Aquetic monfood Industrial 6. Aquatic nonfood residential Terrestrial food feed crop
- C Terrestrial manifood crop
 N Greenhouse food crop

E - Aquatic nonfood outdoor

Aquatic food crop

- M Indoor nonfood - 0 N · Indoor Medical Greenhouse nonfood crop
- 0 Indoor residential J - Forestry

POOTNOTES: (The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1): *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.160 for enforcement discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.173 for certification of limits (62-2); and *158.180 for enforcement
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought. analytical methods (62-3).
- Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. the extent this information is available. If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted
- bata on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data
- Certified limits are not required for inert ingredients in products proposed for experimental use will suffice to support an experimental use permit.
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent-
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- **はまはだニさっ**5 Required if product is a liquid.
- Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pM less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- of potential eye and dermal irritation effects.
- × Required unless repeated dermal exposure does not occur under conditions of use Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other chalinesterase inhibitors and other posticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Protection Agency Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certifications specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that products are efficacious when used in accordance with label directions and commently accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses The agency has valved all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (suc or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary.

The Agency has determined that submission of efficacy data is required to support the claims made for products claimed to repet verebrate animals.

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE CMS No. 2070-0107 Approval Expires 12-31-92 form Approved Page 1 of 2

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company rate and Address DELIA ANALYTICAL AGENT FOR: SAFER	CAL CORP	2. case # and Name 4083 Soap	salts			3. Date PRO	Date and Type of DCI PRODUCT SPECIFIC TO# 42697-RD-2316	IFIC
SILVER SPRING	S MD 20910	EPA Reg. No.	o. 42697-35	7-35				1
4. Guideline Requirement Number	5. Study Title	Progress Reports	6. Use Pattern		7. Test Substance		8. Time from:	9. Registrant Response
	Prod Chem - Regular Chemical							
61-1	Product identity & composition(1)		ABC	HIJK M	OMP/EP		8 mos.	
61-2 (a)	Descrip of starting materials,(1,2) production & formulation		ABC	HIJK M	OMP/EP		8 mos.	
			, D	M ALIN	O Mo / sto		0	
1,11	impurities				•			
62-1	Proliminary analysis (1,4)		ABC		OMP/EP	•	8 mos.	
62-2	Certification of limits (1,5)		ABC	HIJK M	OMP/EP			
62-3	Analytical method (1)		ABC		OMP/EP			
63-2	Color		ABC		_		8 mos.	
63-3	Physical state		ABC		OMP/EP		-	
63-4	Odor		ABC		OMP/EP			
63-7	Density		ABC				8 mos.	
63-12	P# (9)		ABC		MP/		8 mos.	
63-14	Oxidizing or reducing action (10)		ABC	HIJK M	OMP/EP		8 mos.	
10. Certification					-	11. Date		
I certify that the statements I acknowledge that any knowin or both under applicable law.	certify that the statements made on this form and all attachments are true, accurate, and complete. ecknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	ts are true, accurate, y be punishable by fine	and complete, imprisons	ment te.				
Signature and Title of Co	Signature and Title of Company's Authorized Representative							
12. Name of Company Contact	et .		•			3. Phone Number	æ	

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

ons No. 2070-0107

Approval Expires 12-31-92

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Use additional sheet(s) if necessary.

Use additional sheet(s) if necessary.	if necessary.									•			
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	res ICAL CORP APER INC	2. C	Case # 4083	웃	Soap	salts	Ų1				3. Date a	Date and Type of DCI PRODUCT SPECIFIC TO A 2507 - BD - 222	IFIC
1414 FENWICK L SILVER SPRINGS	IN GS MD 20910	ন	EPA	Reg.		No. 42	42697-35				107	TOP 42001-NU-2010	
4. Guideline	5. Study Title	-0.27		Pro	Progress				7.	lest		8. Time	9. Registrant
Humber		-000	-1	7	2 3						-		Scientifica
63-15	Flamability (11)					ABC	ALIK		3	MP/EP		8 mos.	
63-16			_	_	_	ABC	HLJK	X	<u>0</u>	OMP/EP		8 mos.	
63-17	Storage stability					ABC	HIJK	z	3	OMP/EP		8 mos.	
63-18	Viscosity (13)		_			ABC	HIJK	X	3	MP/EP		8 mos.	
63-19	Miscibility (14)			_		ABC	HIJK	:	0	OMP/EP		8 mos.	
63-20	Corrosion characteristics					ABC	HIJK	*	0	OMP/EP		8 mos.	
63-21	Dielectric breakdown voltage (15)					ABC	HIJK	X	OEP P			8 mos.	
	Acute Toxic - Resuler Chemical												-
81-1	Acute oral toxicity-rat (1,36,37)			·		ABC	HLJK	I	<u>O</u>	OMP/EP			
81-2	Acute dermal (1,2,37)	- -			<u>.,</u>	ABC	KLJK		<u> </u>	OMP/EP		8 mos.	
81-3	Acute inhalation toxicity-ret			·		ABC	HIJK	X	8	OMP/EP			
81-4	¥				•	ABC	HIJK	3) C	OMD/ET			
80 11 (6) U	Dermal sensitization (4)		_			ABC	HLJK	寓:	3	OMP/EP			
	Efficacy - Vertebrate Centrol Agents					-							
96-19	Browsing animal repellents (1)	_				ABC	*		- EP	70		8 mos.	
Initial to indicate ceri	Initial to indicate certification as to information on this page			+	-			Date	"				
(full text of certification is on page one).	tion is on page one).						<u></u>						

United States Environmental Protection Agency Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGA1 = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. data pertaining to the purchased product. [MOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cit

Use Categories Key: A - Terrestrial food crop

K - Residential outdoor

- Aquetic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic nonfood residential
 L - Indoor food
 - * C - Terrestrial nonfood crop Greenhouse food crop

M · Indoor nanfood

- E Aquatic nonfood outdoor
- N Indoor Medical 1 - Greenhouse nonfood crop
- D Aquatic food crop 0 - Indoor residential J - Forestry

POOLDOLOS: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Chem - Regular Chemical

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- Data on other end-use products will be required on a case-by-case basis. For posticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use.
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- required if product contains combustible liquids.
- lequired if product is a liquid.
- Required if product is potentially explosive.
- ままはお=80
- Required if product is an emutsifiable liquid and is to be diluted with petroleum solvents.

Acute Toxic - Regular Chamical

- of potential eye and dermal irritation effects. Not required if test material is a gas or highly volatile. Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- ¥ . Required unless repeated dermal exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticides demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Protection Agency Washington, D. C. 20460

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

47 Teating of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1). prior to initiation of studies.

Efficacy - Vertebrate Control Agents

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United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved

ONB No. 2070-0107

Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

And description of the second			ļ	l	l										
1. Company name and Address DELTA ANALYTICAL AGENT FOR: SAFER	TCAL CORP		Case # 4083	5	and Hame Soap	ס	salts					J. Dat	o Duo	Date and Type of BCI PRODUCT SPECIFIC	IFIC
1414 FENWICK LA SILVER SPRINGS	GS MD 20910		EPA		Reg.	No.	. NC8300110	0011	0				•	TUP 42097-ND-2337	-
4. Guideline Roquirement	5. Study Title			7.7	Progress Reports		6. Use Pattern	1			7. Test Substance	-	F7 . 1	i i	9. Registrant Response
Number				_	~	<u>"</u>									
	Prod Chen - Regular Chemical			_											
61-1	Product identity & composition(1)						ABC	HIJK		<u>o</u> _	OMP/EP			8 mos.	
61-2(a)	Descrip of starting materials, (1,2)						ABC	HIJK	X	<u> </u>	OMP/EP				
	proc														
61-2(b)	Discussion of formation of (1,3)						ABC	HIJK	*		OMP/EP			8 mos.	
	igurities							: !							
62-1				_			ABC	1117			MP/EP				
62-2	Certification of limits (1,5)		_				ABC	HLUX			MP/NP		- c		
62-3	Analytical method (1)						ABC	HIJK			MP/EP		000	mos.	
63-2	Color						ABC	HIJK		0	MP/EP		œ	mos.	
63-3	. Physical state					_	ABC	HIJK	× ×	0	MP/EP			mos.	
63-4	Octor		·			<u>.</u>	ABC	HIJK		<u></u>	MP/EP			mos.	
63-7	Density					_	ABC	HIJK		0	MP/EP			mos.	
63-12	P# (9)		_			_	ABC	HLJK			_			mos.	
63-14	Oxidizing or reducing action (10)						ABC	HIJK	×	<u> </u>	MP/EP			mos.	
10. Certification		-	}	ŀ	}	-					-	11. Date			
I certify that the stat	I certify that the statements made on this form and all attachments are true, accurate, and complete.	(S = 70	Ę		Cur		nd complet	•							
or both under applicable law.	a extracting that any movingly rather or mistersing attrement may be published by the jump or more or both under applicable law.	8	2		\$	į	į	;			<u> </u>				
Signature and Title of	Signature and little of Company's Authorized Representative														
12. Name of Company Contact	tect										_	13. Phone Number	1		

United States Environmental Protection Agency Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB No. 2070-0107 form Approved Approval Expires 12-31-92

1. Company nume and Address DELTA ANALYTICAL AGENT FOR: SAFER	Address YTICAL CORP			Case # 4 4083	and state Soa	Soap	salts				3. Date and TAP	Date and Type of DCI PRODUCT SPECIFIC	IFIC
20.70	GS MD 20910		EPA		Reg.	No.		NC83001100			707	TOT 12001 NO 2001	200
4. Guideline Requirement	5. Study Title		0~0× 7		Progress Reports	3.6	6. Use Pattern			7. lest Substance	r Gs	8. Time frame	9. Registrant Response
Humber			-00	-	2	3							
63-15	Flamability	(11)		1			ABC	ИГЛК	X	MP/EP		8 mos.	
63-16		(12)					ABC	HIJK	X	MP/			
63-17	Storage stability						ABC	HIJK		MP/EP			
63-18	Viscosity	(13)					ABC	HIJK	X 0	MP/EP		8 mos.	
63-19	Niecibitity	(34)					ABC	HIJK	3	MP/EP		8 mos.	
63-20	Corrosion characteristics						ABC	HLJK	3			8 mos.	
63-21	Dielectric breakdown voltage	• (15)					ABC	HIJK	X 0	EP .		8 mos.	
	Acute Toxic - Regular Chemical												
81-1	Acute oral toxicity-rat	(1,36,37)					ABC	HIJK	×	OMP/EP		8 mos.	
81-2	Acute dermai	(1,2,37)				-	ABC	HIJK		MP/EP	-	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC	HIJK	X	MP/EP	_	8 mos.	
81-4	Primary eye irritation-rabbit (2)	it (2)					ABC	HIJK		OMP/EP			-
81-5	Primary dermal irritation Dermal sansitization	(1,2)					ABC	HIJK	ZZ	OMP/EP	_	8 mos.	
	Efficacy - Vertebrate Centrol Agents	Agents			(19 <u>19</u>								
1		Browsing animal repellents (1)					ABC	*		EP		8 mos.	

United States Environmental D. ပ္ Protection Agency 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

Key: NP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredients) from a registered source, they need into data pertaining to the purchased product. [NOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; IEP = typical end-use product; not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; IEP = typical end-use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite

Use Categories Key:

Residential outdoor

- Terrestrial food crop Aquatic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic nonfood residential
 L - Indoor food = 0 Greenhouse food crop Terrestrial nonfood crop
- -D - Aquatic food crop N - Indoor Medical Greenhouse nonfood crop 0 - Indoor residential Aquatic nonfood outdoor

FOOTNOTES: [The following notes are referenced in column two (5. Study Title) of the REGUIRERENTS STATUS AND REGISTRANT'S RESPONSE form.]

M - Indoor nonfood

Prod Chem - Regular Chemical

- product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.170 for enforcement discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for armitytical methods (62-3).
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- Certified limits are not required for inert ingredients in products proposed for experimental use.
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- Required if product contains combustible liquids.
- **ボポロポコロッ**5 Required if product is potentially explosive. Required if product is a liquid.
- Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
- if end-use product is liquid and is to be used around electrical equipment.

Acute Taxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- of potential eye and dermal irritation effects. Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- Required unless repeated dermai exposure does not occur under conditions of use.
- Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Washington, D. C. Protection Agency 20460

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

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37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certific applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy -**Vertebrate Control Agents**

the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that The agency has maived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such

The Agency has determined that submission of efficacy data is required to support the claims made for products claimed to repet verebrate animals.

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

form Approved
OMB No. 2070-0107
Approval Expires 12-31-9.

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

Open and the party and								İ					
1. Company name and Address MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	ORATION DR. 92121	2. Case 408 EPA	χ ^ω ,	d Name Soaps	salts , 53219-4					3. Date PROI ID#	Ce and ODUC	Date and Type of DCI PRODUCT SPECIFIC ID# 53219-RD-2338	IFIC -2338
6. Guideline Requirement Number	5. Study Title	-00-0×1	1 Pro	Progress Reports	6. Use Pattern			Sut	7. Test Substance		8. Ti	Time one	9. Registrant Response
	Frod Chan - Resular Chanical							<u> </u>					
61-1	Product identity & composition(1)				ABC	HIJK	Z C	OMP/EP	/EP		 &	BOS.	
61-2(a)	Descrip of starting amterials,(1,2) production & formulation				ABC	HIJK		OMP/EP	/EP		 &	mos.	
(1-3/5)					ARC	HTTK	K	O MO / FD	/ 된		x	500	
					,								
62-1	Preliminary analysis (1,4)				ABC	HIJK		OMP/EP	/EP		8	mos.	
62-2	Certification of limits (1,5)				ABC	HIJK	Z	OMP	MP/EP		00	mos.	
62-3	Analytical method (1)				ABC	HIJK	3	OMP/	/EP			mos.	
63-2	Color				ABC	HIJK		/amo	/EP		&	mos.	
63-3	Physical state	•			ABC	ACIH	X	OMP/	/EP		8	mos.	
63-4	Odor				ABC	HIJK	3	OMP/	/EP			mos.	
63-7	Density				ABC	HIJK	X	O M T	MP/EP		- 80	mos.	-
63-12	P# (9)				ABC	HIJK	X		MP/EP		00	mos.	
63-14	Oxidizing or reducing action (10)				ABC	HIJK	X	O M P	MP/EP		80	mos.	
10. Certification				ŀ					=	11. Date			
I certify that the statements I acknowledge that any knowin or both under applicable law.	I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	be pur	irue, acc sishable	urate, by tine	and comple , imprison	ment							
Signature and Title of C	Signature and Title of Company's Authorized Representative												
12. Wame of Company Contact	act.								=	13. Phone Number	mber T		
									•				

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE Form Approved CMB No. 2070-0107 Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(a) if necessary.

1. Company name and Address MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	ORATION DR. 92121	2.	2. Case # 4083 EPA	Case # 4083 EPA		Reg.	Soap s.	Soap salts	4				3. Date of PROD	3. Date and Type of DCI PRODUCT SPECIFIC ID# 53219-RD-2338	-23
4. Guideline Requirement	5. Study Title		0-027		- 70	r og tepo	Progress Reports	6. Use Pattern			27	7. Test Substance	70.00	8. Time	
Number			COC	_	\vdash	~	3								
63-15	Flamability	(11)	-					ABC	ніјк	3	/ GW	P/EP		8	mos.
63-16	•	(12)	_					ABC	HIJK	X		MP/EP			mos.
63-17	lity			_	_		_	ABC	XCIH		Ĭ	MP/EP			nos.
63-18		(13)						ABC	HLJK		Ĭ	MP/EP			mos.
63-19	4	3					_	ABC	HIJK		Ĭ	MP/EP		_	mos.
63-20	Corresion cheracteristics							ABC	HLJK	X O	E	MP/EP		8	mos.
63-21	ş	(15)		• •				ABC	HIJK	0	EP			8	mos.
	Acute Toxic - Resuler Chemical														
81-1	Acute oral toxicity-rat	(1,36,37)						ABC	HIJK	X O	X	P/EP		ä 80	mos.
81-2		(1,2,37)	_		·			ABC	HIJK	X O		MP/EP			mos.
81-3	Acute inhalation toxicity-rat							ABC	HIJK	X	Ĭ	MP/EP		æ ≅	mos.
81-4	Primary eye irritation-rabbit (2)	2						ABC	HLJK		Ĭ	MP/EP			mos.
81-5	Primary dermat irritation	(1,2)						ABC	HIJK	X	I	OMP/EP			mos.
81-6		3					•	ABC	HIJK		3	OMP/EP		8	mos.
	Efficacy - Vertebrate Control Agents														
96-19	Browsing animal repellents (1)	3						ABC	*		E	-0		8 11	mos.
Initial to indicate certification as to info (full text of certification is on page one).	Initial to indicate certification as to information on this page (full text of certification is on page one).	is page	H		-					Date	ľ				
	Control of the product of the control of the contro								_						

United States Environmental Protection Agency Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case f and Name: 4083 Soap salts

not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; TEP = typical end-use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. data pertaining to the purchased product. [MOIE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cita

Use Categories Key:

K - Residential outdoor

Aquetic nonfood Industrial

- Terrestrial food crop
- 8 Terrestrial food feed crop 6 Aquatic monfood residential L · Indoor food C - Terrestrial nonfood crop
 H - Greenhouse food crop
 N - Indoor nonfood
 - D Aquatic food crop
- Indoor Medical Greenhouse nonfood crop
 - J Forestry Aquatic nonfood outdoor

FOOTNOTOS: (The following notes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.)

Prod Cham - Regular Chamical

- product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for analytical methods (62-3).
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental If the posticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to use permit is being sought.
- Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products produced by an integrated system. the extent this information is available.
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an exidizing or reducing agent.
- Required if product contains combustible liquids.
- はだまち Required if product is potentially explosive. product is a liquid.
-) if product is an emulsifiable tiquid and is to be diluted with petroleum solvents.
- Acute Toxic Regular Chamical
- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis
- Required unless repeated dermal exposure does not occur under conditions of use. of potential eye and dermat irritation effects.
- ۲ X Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other posticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Protection Agency Washington, D. C. 20460

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodolog

37 prior to initiation of studies.

Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certif applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

The agency has salved all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (su as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing the or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses

The Agency has determined that submission of efficacy data is required to support the claims made for products claimed to repel verebrate animals.

United States Environmental Protection Agency Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

form Approved
OMB No. 2070-0107
Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(a) if necessary.

1. Company mane and Address MYCOGEN CORPORATION 5451 OBERLIN DR.		2. C 4.	Case # and Name 4083 Soa	5	Soap	ਰ	salts					3. 0at PR ID		17 17 132	Date and Type of DCI PRODUCT SPECIFIC ID# 53219-RD-2339	[FIC -2339
SAN DIEGO CA	92121	[1]	EPA	Reg.	g.	No.	53219-5	9-5								
4. Guideline Requirement	5. Study Title	OON-4		7	Progress Reports	* S	6. Use Pattern				7. Test Substance		7.0	8. Time Frame		9. Registrant Response
		-00	1	2		u										
	Prod Chem - Regular Chemical	,,,,,														
61-1	Product identity & composition(1)						ABC	ALIH		<u>3</u>	OMP/EP			œ	mos.	-
61~2(a)	Descrip of starting materials, (1,2)	***************************************					ABC	HIJK	3		OMP/EP			00	mos.	
	proc	***************************************														
61-2(b)	Discussion of formation of (1,3)	•	***************************************				ABC	HIJK	Z	<u> </u>	OMP/EP.		_	œ	mos.	
62-1	Preliminary analysis (1.4)						ABC	HIJK	3	<u>0</u>	MP/EP	-		œ	mos.	
62-2	<u> </u>	***************************************					ABC	HLJK		OMP/	P/EP			œ	mos.	
62-3			,,				ABC	HIJK	3	OMP/	P/EP			∞	mos.	
63-2	Color				•		ABC	HIJK		OMP/				œ	mos.	
63-3	· Physical state	••••••					ABC	HIJK	_	AMP/	P/EP			œ	mos.	
63-4	Odor						ABC	HIJK	_	OMP,	P/EP		_	8	mos.	-
63-7 ·	Density						ABC	HIJK		2	MP/EP			-	mos.	
63-12	P# (9)						ABC	HIJK	•		MP/EP			-	mos.	
63-14	Oxidizing or reducing action (10)						ABC	HIJK	3	<u>0</u>	MP/EP			®	mos.	
10. Certification		ŀ	Ī	ł	ŀ		ļ			ŀ	1	11. Date	ł	ı		
I certify that the statements I acknowledge that any knowin or both under applicable law.	certify that the statements made on this form and all attachments are true, accurate, and complete. acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment robth under applicable law.	5 4	3.5	<u> </u>	₹ 5	tin.	and complet , imprisorm	ent e.								
Signature and Title of C	Signature and Title of Company's Authorized Representative															
12. Name of Company Contect	ret										·	13. Phone Number	mber			
											_					

United States Environmental Protection Agency Washington, D. C. 20460

OMB No. 2070-0107 form Approved

	REQUIREMENTS STATUS		AND REGISTRANT'S		RESPONSE			Approval Expires	OMB No. 2070-0107 Approval Expires 12-31-92
INSTRUCTIONS: Please type or print in Use additional sheet(s) if necessary.	type or print in ink. Please read carefully the attached instructions and supply the in necessary.	lly the attach	hed instruct	ions and sup		information requested on this form.	ed on this form.		
1. Company name and Address MYCOGEN CORPOR		2. Case # 4083	f and Name 3 Soap	salts	٠			Date and Type of DCI PRODUCT SPECIFIC	[FIC
SAN DIEGO CA	N DR. A 92121	EPA	EPA Reg. No.	0. 53219-5	9-5		ID# 5:	53219-RD-2339	-2339
4. Guideline Requirement Number	5. Study Title	000-027	Progress Reports	6. Use Pattern		7. Yest Substance	8. Ti	8. Time Frame	9. Registrant Response
63-15	Flambility (11)			ABC	H NCIH	OMP/EP	8	mos.	
63-16	~			ABC	N ACIH	OMP/EP			
63-17	Hty			ABC	M MLIH	OMP/EP			
63-18	Viscosity (13)			ABC	•	OMP/EP	<u></u>		
63-19	₹			ABC	- •	OMP/EP			
63-20	Corresion characteristics			ABC	HIJK N	OMP/EP		mos.	
63-21	Dielectric breakdown voltage (15)			ABC	HIJK K	OEP .		mos.	
	Acute Toxic - Reguler Chesical								
81-1	Acute brat toxicity-rat (1,36,37)	,37)		ABC	H NCIH	OMP/EP	8	mos.	
81-2		37) -		ABC		OMP/EP	 co	mos.	
81-3	Acute inhalation toxicity-rat			ABC	M ACIH	OMP/EP		mos.	
81-4	Primary eye irritation-rabbit (2)			ABC		OMP/EP		mos.	
81-5 81-6	Primary dermal irritation (1,2) Dermal sansitization (4)			ABC	M MCIH	OMP/EP		mos.	
	Efficacy - Vertebrate Control Agents								
96-19	Browsing animal repellents (1)			ABC	*	EP		mos.	
96-19 Browsing animal repellents (1) Initial to indicate certification as to information on this page (full text of certification is on page one).	Browsing animal repellents (1)			ABC	Date				

United States Environmental Protection Washington, D. C. 20460 Agency

POOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case ≠ and Name: 4083 Soap salts

data pertaining to the purchased product.[MOTE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product does not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.]; IEP = typical end-use product; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled. Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cit-

Use Categories Key

- Terrestrial food crop Aquetic nonfood Industrial B - Terrestrial food feed crop
 G - Aquatic nonfood residential
- Indoor food

Residential outdoor

- C Terrestrial nonfood crop
 N Greenhouse food crop M - Indoor nanfood
 - 1 Greenhouse nonfood crop J - Forestry E - Aquatic nonfood outdoor

D - Aquatic food crop N - Indoor Medical

FOOTNOTES: [The following notes are referenced in column two (5. Study Title) of the REGUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chem - Regular Chemical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement
- N A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental analytical methods (62-3).
- If the pesticide is not stready under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to Required to support the registration of each manufacturing-use product (including registered TGAIs) as well as end-use products produced by an integrated system. the extent this information is available. use permit is being sought.

Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data

- Certified limits are not required for inert ingredients in products proposed for experimental use will suffice to support an experimental use permit.
- Required if test substances are dispersible with water.
- 2500 Required if product contains an oxidizing or reducing agent.
- Required if product contains combustible liquids.
- Required if product is potentially explosive.
- はだ if product is a liquid.
- product is an emulaifiable liquid and is to be diluted with petroleum solvents.
- end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis Not required if test material is a gas or highly volatile.
- Required unless repeated dermal exposure does not occur under conditions of use. of potential eye and dermal irritation effects.

8.

Special testing (acute, subchronic, and/or chronic) is required for organophospates, and may be required for other cholinesterase inhibitors and other pesticides which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

United States Environmental Protection Agency Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Pootnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certifie applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that

The Agency has determined that submission of efficacy data is required to support the claims made for products claimed to repel verebrate animals.

United States Environmental Protection Agency Washington, D. C. 20460 REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB No. 2070-0107 Form Approved Approval Expires 12-31-92

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

		7									1		
1. Company name and Address MYCOGEN CORPOR	corporation	2. C	2. Case # and Name 4083 Soa	S	Soap	salts	•				3. p	PRODUCT SPEC	SPECIFIC
SAN DIEGO CA	92121	int	EPA	Reg.		No. 532	53219-6				<u> </u>	10# 33219-KU-2340	XD-7040
4. Guideline Requirement	5. Study Title	70-07-6		R P Q	Progress Reports	6. Use Pettern				7. Test Substance		8. Time Frame	9. Registrant Response
Number:			-	2	w				┝				
	Prod Chen - Regular Chemical							•					
61-1	Product identity & composition(1)		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			ABC	HIJK		<u>0</u>	OMP/EP		8 mos.	
61-2(a)	Descrip of starting materials, (1,2)					ABC	HIJK	3	3	OMP/EP		8 mos.	
	production & formulation proc												
61-2(b)	Discussion of formation of (1,3)					ABC	HIJK	X	<u>0</u>	OMP/EP		8 mos.	
	impurities								<u> </u>) 	•	1	
62-1	Preliminary analysis (1,4)					ABC	HIJK	3	0	MP/EP		8 mos.	-
62-2	Certification of limits (1,5)					ABC	HIJK	3	3	MP/EP		8 mos.	-
62-3						ABC	HIJK	3	<u>0</u>	MP/EP		8 mos.	
63-2	Calor	······				ABC	HIJK		OMP/	P/EP		8 mos.	
63-3	· Physical state					ABC	HIJK		OMP	P/EP		8 mos.	
63-4	Odor					ABC	HIJK		OMP/	P/EP		8 mos.	_
63-7	Density					ABC	HIJK	3	OMP	P/EP		8 mos.	•
63-12	PL (9)					ABC	HIJK		OMP	P/EP		8 mos.	
63-14	Oxidizing or reducing action (10)					ABC	HIJK	3	0	MP/EP		8 mos.	
10. Certification		-	ŀ	t	f				ŀ		11. Date		
I certify that the statements I acknowledge that any knowledge that any knowledge or both under applicable law.	I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.	0 m	Si Sh	ecc.	rate, by fin	and compi e, impriso	rment			······································			
Signature and Title of C	Signature and Title of Company's Authorized Representative												
12. Hame of Company Contact	#CP							i			13. Phone Humber	funber	

United States Environmental Protection Agency Washington, D. C. 20460 BEOUTREMENTS STATUS AND REGISTRANT'S RESPONSE

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
ONB No. 2070-0107
Approval Expires 12-31-92

THOTOMON DIAMENTON		and the latest the same		İ	ï					After annual to the	44 1 4	\vdash		
Use additional sheet(s) if necessary.	if necessary.	aracy colo			;		10 at 10 at		9	into sector represent on this form.	Off this form			
1. Company name and Address MYCOGEN CORPOR	and Address CORPORATION	2.	Case # 4083		POS PERI PUR	Soap	salts				3. Date an	C14	Date and Type of DCI PRODUCT SPECIFIC	FIC
5451 OBERLIN	DR.										ID# 6	532	ID# 53219-RD-2340	2340
SAN DIEGO CA	92121		EPA		Reg.	. No.). 53219-6	96						
4. Guideline Requirement	5. Study Title		0-0×		Progress Reports	ress	6. Use Pattern			7. Test Substance	TT (3)	8. Time frame		9. Registrant Response
Humber			_00		2	3								
63-15	Flambility (CID					ABC	н угтн	0	43/dH		œ	mos.	
-	odability	(12)	_				ABC		0	_		Ī.	mos.	
63-17	Storage stability		_			_	ABC	HIJK M	0	MP/EP	 -	00	mos.	
63-18	Viscosity	(13)					ABC	HIJK M	0	MP/EP		00	mos.	
63-19	Miscibility (35					ABC	HIJK M	0		•	•	mos.	
63-20	Corrosion characteristics						ABC	HIJK	0	MP/EP		00	mos.	
63-21	Dielectric breakdown voltage ((15)					ABC	HIJK M	0			©	nos.	
;,	Acute Toxic - Resuler Chemical									•				
81-1	Acute oral toxicity-rat ((1,36,37)					ABC	HIJK M		OMP/EP			mos.	
81-2		(1,2,37)			,		ABC	HIJK M		MP/EP		00	mos.	
81-3	Acute inhalation toxicity-rat						ABC	HIJK M		OMP/EP		&	mos.	
81-4	Primary eye irritation-rabbit (2)	2					ABC	HIJK M		OMP/EP			mos.	
81-5	Primary dermal irritation ((1,2)					ABC			ONP/EP			mos.	
81-6		3					ABC	HIJK M	0	MP/EP		0 0	mos.	
	Efficacy - Vertebrate Control Agenta													
96-19	Browsing enime: repellents (1)	.				_	ABC	*		판		œ	mos.	
Initial to indicate certification as to info (full text of certification is on page one).	Initial to indicate certification as to information on this page (full text of certification is on page one).	s page						D _a	Date					

United States Environmental Washington, D. C. Protection Agency 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

data pertaining to the purchased product. (MOIE: If a product is a 100 percent repackage of another registered product that is purchased, and any use for the product do not differ from those of the purchased and registered source, users are not subject to any data requirements identified in the tables.); IEP = typical end-use product; TGAl = technical grade of the active ingredient; PAI = "puro" active ingredient; PAIRA = "puro" active ingredient, radiotabeled. Key: NP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or c

Use Categories Key:

- Terrestrial food crop e . Terrestrial food feed crop
- Aquetic nonfood industrial Aquetic nonfood residential
- K Residential autdoor -Indoor food
- C Terrestrial monfood crop
 H Greenhouse food crop
 M Indoor nonfood Greenhouse nonfood Aquatic food crop
- W Indoor Medical crop - m 0 - Indoor residential

Aquatic nonfood outdoor

FOOTNOTES: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chan - Regular Chanical

- Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.160 for enforcement discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3). *158.180 for enforcement
- A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under use permit is being sought. full scale production and an experimental
- w the extent this information is available. If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to
- Data on other end-use products will be required on a case-by-case basis. For pesticides in the development state, a rudimentary product analytical method and data Required to support the registration of each manufacturing-use product (including registered IGAIs) as well as end-use products produced by an integrated system. will suffice to support an experimental use permit.
- Certified limits are not required for inert ingredients in products proposed for experimental use
- Required if test substances are dispersible with water.
- Required if product contains an oxidizing or reducing agent.
- Required if product is potentially explosive. Required if product contains combustible liquids.
- Required if product is a liquid.
- なまはだこさゅっ if product is an emulsifiable liquid and is to be diluted with petroleum solvents. If end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

- Not required if test material is a gas or highly volatile.
- Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
- Required unless repeated dermal exposure does not occur under conditions of use.
- Special resting (acute, subchronic, and/or chronic) is required for organophospates, demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology and may be required for other cholinesterase inhibitors and other pesticides

United States Environmental Protection Agency Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

prior to initiation of studies. which have demonstrated a potential to adversely affect the visual system. Registrants should consult with the agency for development of protocols and methodology

37 Testing of the EP dilution is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certifications applicators appecified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

Efficacy - Vertebrate Control Agents

or benefits data in cases of special reviews) submission of efficacy data for any pesticide product, registered or proposed for registration when necessary. the relevant data upon which the determination of efficacy is based. The Agency reserves the right to require, on a case-by-case basis (e.g., significant new uses as rodents, birds, bats, canids, and skurks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing that his products are efficacious when used in accordance with label directions and commenty accepted pest control practices. The registrant must develop and maintain The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (such

The Agency has determined that submission of efficacy date is required to support the claims made for products claimed to repel verebrate animals.



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

JL 29 1986

PR NOTICE 86-5

PROTICIOSS AND TOXIC SUSSTANCES

NOTICE TO PRODUCERS, FORMULATORS, DISTRIBUTORS AND REGISTRANTS

Attention: Persons responsible for Federal registration of

pesticides.

Subject: Standard format for data submitted under the Pederal

Insecticide, Pungicide, and Rodenticide Act (FIFRA) and certain provisions of the Federal Food, Drug,

and Cognetic Act (FFDCA).

I. Purpose

To require data to be submitted to the Environmental Protection Agency (EPA) in a standard format. This Notice also provides additional guidance about, and illustrations of, the required formats.

II. Applicability

This PR Notice applies to all data that are submitted to EPA to satisfy data requirements for granting or maintaining pesticide registrations, experimental use permits, tolerances, and related approvals under certain provisions of PIFRA and PPDCA. These data are defined in PIFRA \$10(d)(1). This Notice does not apply to commercial, financial, or production information, which are, and must continue to be, submitted differently under separate cover.

III. Effective Date

This notice is effective on November 1, 1986. Data formatted according to this notice may be submitted prior to the effective date. As of the effective date, submitted data packages that do not conform to these requirements may be returned to the submitter for necessary revision.

IV. Background

On September 26, 1984, EPA published proposed regulations in the Federal Register (49 PR 37956) which include Requirements for Data Submission (40 CFR \$158.32), and Procedures for Claims of Confidentiality of Data (40 CFR \$158.33). These regulations

specify the format for data submitted to EPA under Section 3 of FIFRA and Sections 408 and 409 of FFDCA, and procedures which must be followed to make and substantiate claims of confident ality. No entitlements of the confident of the proposed regulation or by this notice.

OPP is making these requirements mandatory through this Notice to gain resource-saving benefits from their use before the entire proposed regulation becomes final. Adequate lead time is being provided for submitters to comply with the new requirements.

V. Relationship of this Notice to Other OPP Policy and Guidance

While this Notice contains requirements for organizing and formatting submittals of supporting data, it does not address the substance of test reports themselves. "Data reporting" guidance is now under development in OPP, and will specify how the study objectives, protocol, observations, findings, and conclusions are organized and presented within the study report. The data reporting guidance will be compatible with submittal format requirements described in this Notice.

OPP has also promulgated a policy (PR Notice \$6-4 dated April 15, 1986) that provides for early screening of certain applications for registration under FIFRA \$3. The objective of the screen is to avoid the additional costs and prolonged delays associated with handling significantly incomplete application packages. As of the effective date of this Notice, the acreen will include in its criteria for acceptance of application packages the data formatting requirements described herein.

OPP has also established a public docket which imposes deadlines for inserting into the docket documents submitted in connection with Special Reviews and Registration Standards (see 40 CFR \$154.15 and \$155.32). To meet these deadlines, OPP is requiring an additional copy of any <u>data</u> submitted to the docket. Please refer to Page 10 for more information about this requirement.

For several years, OPP has required that each application for registration or other action include a list of all applicable data requirements and an indication of how each is satisfied—the statement of the method of support for the application. Typically, many requirements are satisfied by reference to data previously submitted—either by the applicant or by another party. That requirement is not altered by this notice, which applies only to data <u>submitted</u> with an application.

VI. Format Requirements

A more detailed discussion of these format requirements follows the index on the next page, and samples of some of the requirements are attached. Except for the language of the two alternative forms of the Statement of Data Confidentiality Claims (shown in Attachment 3) which cannot be altered, these samples are illustrative. As long as the required information is included and clearly identifiable, the form of the samples may be altered to reflect the submitter's preference.

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A. Organization of Submittal Package

A 'submittal package' consists of all studies submitted at the same time for review in support of a single regulatory action, along with a transmittal document and other related administrative material (e.g. the method of support statement, EPA Forms 8570-1, 8570-4, 8570-20, etc.) as appropriate.

Data submitters must organize each submittal package as described in this notice. The transmittal and any other administrative material must be grouped together in the first physical volume. Each study included in the submittal package must then be bound separately.

Submitters sometimes provide additional materials that are intended to clarify, emphasize, or otherwise comment to help. Product Managers and reviewers better understand the submittal.

- If such materials relate to one study, they should be included as an appendix to that study.
- If such materials relate to more than one study (as for example a summary of all studies in a discipline) or to the submittal in general, they must be included in the submittal package as a separate study (with title page and statement of confidentiality claims).

B. Transmittal Document

The first item in each submittal package must be a transmittal industry. Third ment identifies the submitter or all joint submitters; the regulatory action in support of which the package is being submitted—i.e., a registration application, petition, experimental use permit (EUP), \$3(c)(2)(B) data call—in, \$6(a)(2) submittal, or a special review; the transmittal date; and a list of all individual studies included in the package in the order of their appearance, showing (usually by Guideline reference number) the data requirement(s) addressed by each one. The EPA-assigned number for the regulatory action (e.g. the registration, EUP, or tolerance petition number) should be included in the transmittal document as-well, if it is known to the submitter. See Attachment 1 for an example of an acceptable transmittal document.

The list of included studies in the transmittal of a data submittal package supporting a registration application should be subdivided by discipline, reflecting the order in which data requirements appear in 40 CFR 158.

The list of included studies in the transmittal of a data submittal package supporting a petition for tolerance or an application for an EUP should be subdivided into sections A, B, C,... of the petition or application, as defined in 40 CFR 180.7 and 158.125, (petitions) or Pesticide Assessment Guidelines, Subdivision I (EUPs) as appropriate.

When a submittal package supports a tolerance petition and an application for a registration or an EUP, list the petition studies first, then the balance of the studies. Within these two groups of studies follow the instructions above.

C. Individual Studies

A study is the report of a single scientific investigation, including all supporting analyses required for logical completeness. A study should be identifiable and distinguishable by a conventional bibliographic citation including author, date, and title. Studies generally correspond in scope to a single Guideline requirement for supporting data, with some exceptions discussed in section C.1. Each study included in a submittal package must be bound as a separate entity. (See comments on binding studies on page 9.)

Each study must be consecutively paginated, beginning from the title page as page 1. The total number of pages in the complete study must be shown on the study title page. In addition (to ensure that inadvertently separated pages can be reassociated with the proper study during handling or review) use either of the following:

- Include the total number of pages in the complete study on each page (ie., 1 of 250, 2 of 250, ...250 of 250).
- Include a company name or mark and study number on each page of the study, e.g., Company Name-1986-23. Never reuse a study number for marking the pages of subsequent studies.

When a single study is extremely long, binding it in multiple volumes is permissible so long as the entire study is paginated as a single series, and each volume is plainly identified by the study title and its position in the multi-volume sequence.

C.1 Special Considerations for Identifying Studies

Some studies raise special problems in study identification, because they address Guidelines of broader than normal scope or for other reasons.

a. <u>Safety Studies</u>. Several Guidelines require testing for safety in more than one species. In these cases each species tested should be reported as a separate study, and bound separately.

Extensive supplemental reports of pathology reviews, feed analyses, historical control data, and the like are often associated with safety studies. Whenever possible these should be submitted with primary reports of the study, and bound with the primary study as appendices. When such supplemental reports are submitted independently of the primary report, take care to fully identify the primary report to which they pertain.

Batteries of acute toxicity tests, performed on the same end use product and covered by a single title page, may be bound together and reported as a single study,

b. Product Chemistry Studies. All product chemistry data within a submittal package submitted in support of an end-use product produced from registered manufacturing-use products should be bound as a single study under a single title page.

Product chemistry data submitted in support of a technical product, other manufacturing-use product, an experimental use permit, an import tolerance petition, or an end-use product produced from unregistered source ingredients, should be bound as a single study for each Guideline series (61, 62, and 63) for conventional pesticides, or for the equivalent subject range for biorational pesticides. The first of the three studies in a complete product chemistry submittal for a biochemical pesticide would cover Guidelines 151-10, 151-11, and 151-12; the second would cover Guidelines 151-13, 151-15, and 151-16; the third would cover Guideline 151-17. The first study for a microbial pesticide would cover Guidelines 151-20, 151-21, and 151-22; the second would cover Guidelines 151-23 and 151-25; the third would cover Guideline 151-26.

Note particularly that product chemistry studies are likely to contain Confidential Business Information as defined in PIPRA \$10(d)(1)(A), (B), or (C), and if so must be handled as described in section D.3. of this notice.

Residue Chemistry Studies. Guidelines 171-4, 153-3. and 153-4 are extremely broad in scope: studies addressing residue chemistry requirements must thus be defined at a level below that of the Guideline code. The general principle, however, of limiting a study to the report of a single investigation still applies fully. Data should be treated as a single study and bound separately for each analytical method, each report of the nature of the residue in a single crop or animal species, and for each report of the magnitude of residues resulting from treatment of a single crop or from processing a single crop. When more than one commodity is derived from a single crop (such as beet tops and beet roots) residue data on all such commodities should be reported as a single study. When multiple field trials are associated with a single crop, all such trials should be reported as a single study.

D. Organization of Each Study Volume

Each complete study must include all applicable elements in the list below, in the order indicated. (Also see Page 17.) Several of these elements are further explained in the following paragraphs. Entries in the column headed 'example' cite the page number of this notice where the element is illustrated.

Element	When Require.	Exam	ole
Study Title Page	Always	Page	12
Statement of Data Confidentiality Claims	One of the two alternative forms of this statement is always required.	Page	13
Certification of Good Laboratory Practice	If study reports laboratory work subject to GLP requirements	Page	16
Flagging statements	For certain toxicology studies. flagging requirements are finali	(When zed.)	
Body of Study	Always - with an English language translation if required.	•	•
Study Appendices	At submitter's option		
Cover Sheet to Confi- dential Attachment	If CBI is claimed under FIFRA \$10(d)(1)(A), (B), or (C)	•	
CBI Attachment	If CBI is claimed under FIFRA (610(d)(1)(A), (B), or (C)	Page	15
Supplemental Statement of Data Confidentiality Claims	Only if confidentiality is claimed on a basis other than FIFRA \$10(d)(1)(A), (B), or (C)	Page	14

D.1 Title Page

A title page is always required for each submitted study, published or unpublished. The title page must always be freely releasable to requestors; DO NOT INCLUDE CBI ON THE TITLE PAGE. An example of an acceptable title page is on page 12 of this notice. The following information must appear on the title page:

- a. Study title. The study title should be as descriptive as possible. It must clearly identify the substance(s) tested and correspond to the name of the data requirement as it appears in the Guidelines.
- b. Data requirement addressed. Include on the title page the Guideline number(s) of the specific requirement(s) addressed by the study.
- c. Author(s). Cite only individuals with p.imary intellectual responsibility for the content of the study. Identify them plainly as authors, to distinguish them from the performing laboratory, study sponsor, or other names that may also appear on the title page.
- d. Study Date. The title page must include a single date for the study. If parts of the study were performed at different times, use only the date of the latest element in the study.
- e. <u>Performing Laboratory Identification</u>. 'If the study reports work done by one or more laboratories, include on the title page the name and address of the performing laboratory or laboratories, and the laboratory's internal project number(s) for the work. Clearly distinguish the laboratory's project identifier from any other reference numbers provided by the study sponsor or submitter.
- f. Supplemental Submissions. If the study is a commentary on or supplement to another previously submitted study, or if it responds to EPA questions raised with respect to an earlier study, include on the title page elements a. through d. for the previously submitted study, along with the EPA Master Record Identifier (MRID) or Accession number of the earlier study if you know these numbers. (Supplements submitted in the same submittal package as the primary study should be appended to and bound with the primary study. Do not include supplements to more than one study under a single title page).
 - g. <u>Facts of Publication</u>. If the study is a reprint of a published document, identify on the title page all relevant facts of publication, such as the journal title, volume, issue, inclusive page numbers, and publication date.

D.2. Statements of Data Confidentiality Claims Under FIFRA \$10(d)(1).

Each submitted study must be accompanied by one of the two alternative forms of the Statement of Data Confidentiality Claims specified in the proposed regulation in \$158.33 (b) and (c). (See Attachment 3) These statements apply only to claims of data confidentiality based on FIFRA \$10(d)(1)(A), (B), or (C). Use the appropriate alternative form of the statement either to assert a claim of \$10(d)(1) data confidentiality (\$158.33(b)) or to waive such a claim (\$158.33(c)). In either case, the statement must be signed and dated, and must include the typed name and title of the official who signs it. Do not make CBI claims with respect to analytical methods associated with petitions for tolerances or emergency exemptions (see NOTE Pq 13).

D.3. Confidential Attachment

If the claim is made that a study includes confidential business information as defined by the criteria of PIFRA \$10(d)(1)(A), (B), or (C) (as described in D.2. above) all such information must be excised from the body of the study and confined to a separate study-specific Confidential Attachment. Each passage of CRI so isolated must be identified by a reference number cited within the -body of the study at the point from which the passage was excised (See Attachment 5).

The Confidential Attachment to a study must be identified by a cover sheet fully identifyin; the parent study, and must be clearly marked 'Confidential Attachment.' An appropriately annotated photocopy of the parent study title page may be used as this cover sheet. Paginate the Confidential Attachment separately from the body of the study, beginning with page 1 of X on the title page. Each passage confined to the Confidential Attachment must be associated with a specific cross reference to the page(s) in the main body of the study on which it is cited, and with a reference to the applicable passage(s) of FIFRA \$10(d)(1) on which the confidentiality claim is based.

D.4. <u>Supplemental</u> Statement of Data Confidentiality Claims (See Attachment 4)

If you wish to make a claim of confidentiality for any portion of a submitted study other than described by FIFRA \$10(d) (1)(A), (B), or (C), the following provisions apply:

- The specific information to which the claim applies must be clearly marked in the body of the study as subject to a claim of confidentiality.
- A Supplemental Statement of Data Confidentiality Claims must be submitted, identifying each passage claimed confidential and describing in detail the basis for the claim. A list of the points to address in such a statement is included in Attachment 4 on Pg 14.
- The Supplemental Statement of Data Confidentiality Claims must be signed and dated and must include the typed name and title of the official who signed it.

5.5 Cood Laboratory Practice Compliance Statement

This statement is required if the study contains laboratory work subject to GLP requirements specified in 40 CFR 160. Samples of these statements are shown in Attachment 6.

E. Reference to Previously Submitted Data

DO NOT RESUBMIT A STUDY THAT HAS PREVIOUSLY BEEN SUBMITTED FOR ANOTHER PURPOSE unless EPA specifically requests it. A copy of the title page plus the MRID number (if known) is sufficient to allow us to retrieve the study immediately for review. This prevents duplicate entries in the Agency files, and saves you the cost of sending more copies of the study. References to previously submitted studies should not be included in the transmittal document, but should be incorporated into the statement of the method of support for the application.

F. Physical Format Requirements

All elements in the data submittal package must be on uniform 8 1/2 by 11 inch white paper, printed on one side only in black ink, with high contrast and good resolution. Bindings for individual studies must be secure, but easily removable to permit disassembly for microfilming. Check with EPA for special instructions before submitting data in any medium other than paper, such as film or magnetic media.

Please be particularly attentive to the following points:

- o Do not include frayed or torn pages.
- o Do not include carbon copies, or copies in other than black ink.
- o Make sure that photocopies are clear, complete, and fully readable.
- o Do not include oversize computer printouts or fold-out pages.
- o Do not bind any documents with glue or binding tapes.
- o Make sure that all pages of each study, including any attachments or appendices, are present and in correct sequence.

Number of Copies Required - All submittal packages except those associated with a Registration Standard or Special Review (see Part G below) must be provided in three complete, identical copies. (The proposed regulations specified two copies; three are now being required to expedite and reduce the cost of processing data into the OPP Pesticide Document Management System and getting it into review.)

G. Special Requirements for Submitting Data to the Docket

Data submittal packages associated with a Registration Standard or Special Review must be provided in <u>four</u> copies, from one of which all material claimed as CRI has been excised. This fourth copy will become part of the public docket for the RS or SR case. If no claims of confidentiality are made for the study, the fourth copy should be identical to the other three. When portions of a study submitted in support of an RS or SR are claimed as CBI, the first three copies will include the CBI material as provided in section D of this notice. The following special preparation is required for the fourth copy.

- O Remove the 'Supplemental Statement of Data Confidentiality Claims'.
- o Remove the 'Confidential Attachment'.
- Excise from the body of the study any information you claim as confidential, even if it does not fall within the scope of FIFRA \$10(d)(1)(A), (B), or (C). Do not close up or paraphrase text remaining after this excision.
- O Mark the fourth copy plainly on both its cover and its title page with the phrase "Public Docket Material contains no information claimed as confidential".

V. For further information

For further information contact William C. Grosse, Chief, Information Services Branch, Program Management and Support Division, (703-557-2613).

Acting Director, Registration Division

Attachment 1. Sample Transmittal Document

Attachment 2. Sample Title Page for a Newly Submitted Study

Attachment 3. Statements of Data Confidentiality Claims

Attachment 4. Supplemental Statement of Data Confidentiality Claims

Attachment 5. Samples of Confidential Attachments

Attachment 6. Sample Good Laboratory Practice Statements

Attachment 7. Format Diagrams for Submittal Packages and Studies

ATTACHMENT 1.

ELEMENTS TO BE INCLUDED IN THE TRANSMITTAL DOCUMENT*

1.	Name and	address	of	submitter	(or	all	joint	submitters**)
----	----------	---------	----	-----------	-----	-----	-------	---------------

TSmith Chemical Corporation Jones Chemical Company 1234 West Smith Street -and- 5678 Wilson Blvd Cincinnati, Qn 98765 Covington, KY 56789

†Smith Chemical Corp. will act as sole agent for all submitters.

2. Regulatory action in support of which this package is submitted

Use the EPA identification number (e.g. 359-EUP-67) if you know it Otherwise describe the type of request (e.g. experimental use permit, data call-in - of xx-xx-xx date).

3. Transmittal date

4. List of submitted studies

- Vol 1. Administrative materials forms, previous correspondence with Project Managers, and so forth.
- Vol 2. Title of first study in the submittal (Guideline No.)
- Vol n. Title of nth study in the submittal (Guideline No.)
- * Applicants commonly provide this information in a transmittal letter. This remains an acceptable practice so long as all four elements are included.
- Indicate which of the joint submitters is empowered to act on behalf of all joint submitters in any matter concerning data compensation or subsequent use or release of the data.

Company	Official:		·
		Name	Signature
Company	Name:		
Company	Contact:	Name	Phone

ATTACHMENT 2.

SAMPLE STUDY TITLE PAGE FOR A NEWLY SUBMITTED STUDY

Study Title

(Chemical name) - Magnitude of Residue on Corn

Data Requirement

Guideline 171-4

Author

John C. Davis

Study Completed On

January 5, 1979

Performing Laboratory

ABC Agricultural Laboratories 940 West Bay Drive Wilmington, CA 39897

Laboratory Project ID

ABC 47-79

Page 1 of % (X is the total number of pages in the study)

ATTACAMENT 3.

STATEMENTS OF DATA CONFIDENTIALITY CLAIMS

1. No claim of confidentiality under FIFRA \$10(d)(1)(A),(B), or (C)

STATEMENT OF NO DATA CONFIDENTIALITY CLAIMS

aubeuli.			·
ompany Agent:		Typed Name	Date:
	Title		Signature

2. Claim of confidentiality under FIFRA \$10(d)(1)(A), (B), or (C).

STATEMENT OF DATA CONFIDENTIALITY CLAUS

of FIFRA \$10(d)(1)(confidential on the basis of A), (B), or (C) has been removed as-reference number in the bo	its falling within the scope wed to a confidential appendix, dy of the study.
Oumpany Agent:	Typed Name	Date:
Ti	Lle	Signature

NOTE: Applicants for permanent or temporary tolerances should note that it is OPP policy that no permanent tolerance, temporary tolerance, or request for an emergency exemption incorporating an analytical method, can be approved unless the applicant weives all claims of confidentiality for the analytical method. These analytical methods are published in the FDA Pesticide Analytical Methods Manual, and therefore cannot be claimed as confidential. OPP implements this policy by returning submitted analytical methods, for which which confidentiality claims have been male, to the submitter, to obtain the confidentiality weiver before they can be processed.

ATTACHMENT 4.

SUPPLEMENTAL STATEMENT OF DATA CONFIDENTIALITY CLAIMS

for any portion of a submitted study that is not described by FIFRA \$10(d)(1)(A), (B), or (C), but for which you claim confidential treatment on another basis, the following information must be included within a Supplemental Statement of Data Confidentiality Claims:

- Identify specifically by page and line number(s) each portion of the study for which you claim confidentiality.
- O Cite the reasons why the cited passage qualifies for confidential treatment.
- o Indicate the length of time--until a specific date or event, or permanently--for which the information should be treated as confidential.
- Identify the measures taken to guard against undesired disclosure of this information.
- Describe the extent to which the information has been disclosed, and what precautions have been taken in connection with those disclosures.
- Enclose copies of any pertinent determinations of confidentiality made by EPA, other Federal agencies, or courts concerning this information.
- c If you assert that disclosure of this information would be likely to result in substantial harmful effects to you, describe those harmful effects and explain why they should be viewed as substantial.
- o If you assert that the information is voluntarily submitted, indicate whether you believe disclosure of this information might tend to lessen the availability to EPA of similar information in the future, and if so, how.

ATACHEM 5.

EXAMPLES OF SEVERAL CONFIDENTIAL ATTACHMENTS

Example 1 (Confidential word or phrase that has been deleted from the study)

CROSS REFERENCE NUMBER 1 This cross reference number is in place of the following word indicated volume and page refe	s or phrase at the
DELETED WORDS OR PHRASE: Ethylene Glycol-	
PAGE LINE REASON FOR THE DELETION	FIFRA REFERENCE
6 14 Identity of Inert Ingredient	\$10(d)(1)(C)
28 25	•
Example 2 (Confidential paragraph(s) that have been deleted	from the study)
CROSS.MEFERENCE NUMBER 5 This cross reference number is in place of the following paraginalizated volume and page reference.	raph(s) at the
DELETED TENEAGRAPH(S):	-
(Reproduce the deleted paragraph(s) here ())
PAGE LINES REASON FOR THE DELETION	FIFRA REFERENCE
20 4-17 Description of the quality control process	\$10(d)(1)(C)
Example 3 (Confidential pages that have been deleted from the	e study)
CROSS.SEPERACE NEAGER 7 This cross reference number not page is used in place of the foat the indicated volume and page	llowing whole pages
DELETED PHEZ(S): are attached immediately behind this page.	
PAGE(S) REASON FOR THE DELETION	FIFRA REFERENCE
39-61 Description of product manufacturing process	\$10(d)(1)(A)

ATTACHMENT 6.

SAMPLE GOOD LABORATORY PRACTICE STATEMENTS

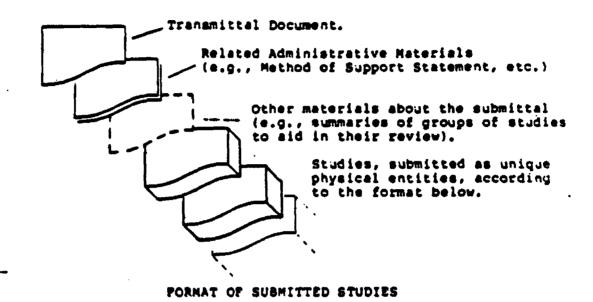
Example 1.

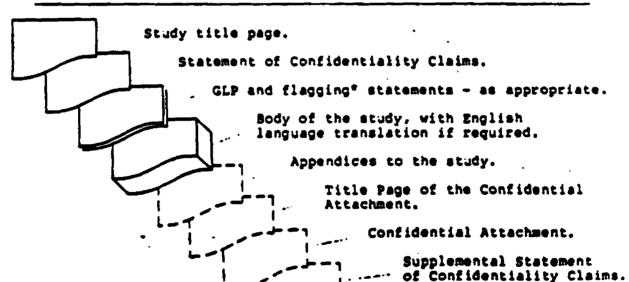
				_
Sponsor				_
Study Director				_
• 2.				
study does not m	eet the re	quirement	of 4C C	FR .
160, and differs	in the fo	llowing w	By#:	•
·				
				_
ubmitter	•			
ponsor				
POMU Dirembar				

been conducted in accordance with 40 CFR Part 160.
Submitter

ATTACHMENT 7.

FORMAT OF THE SUBMITTAL PACKAGE





LEGEND

Documents which must be submitted as appropriate to meet established requirements.

Documents submitted at submitter's option.

are finalized.

When flagging requirements

ATTACHMENT D

EPA GROUPING OF END-USE PRODUCTS FOR MEETING DATA REQUIREMENTS FOR REREGISTRATION

EPA'S BATCHING OF END-USE PRODUCTS CONTAINING SOAP SALTS AS THE ACTIVE INGREDIENT FOR MEETING ACUTE TOXICITY DATA REQUIREMENTS FOR REREGISTRATION

In an effect to reduce the time, resources and number of animals needed to fulfill the acute toxicity data requirements for reregistration of end-use products containing the active ingredients some salts, the Agency has batched products which can be considered similar in terms of acute toxicity. Factors considered in the sorting process include each product's active and inert ingredients (identity, percent composition and biological activity), type of formulation (e.g., emulsifiable concentrate, aerosol, wettable powder, granular, etc.), and labeling (e.g., signal word, use classification, precautionary labeling, etc.). Note that the Agency is not describing batched products as "substantially similar" since some products within a batch may not be considered chemically similar or have identical use patterns.

Batching has been accomplished using the readily available information described above, and frequently acute toxicity data on individual end-use products has been found to be incomplete. Notwithstanding the batching process, the Agency reserves the right to require, at any time, acute toxicity data for an individual end-use product should the need arise.

Registrants of end-use products within a batch may choose to cooperatively generate, submit or cite a single battery of six acute toxicological studies to represent all the products within It is the registrants' option to participate in the that batch. process with all other registrants, only some of the other registrants, or only their own products within a batch, or to generate all the required acute toxicological studies for each of their own products. If a registrant chooses to generate the data for a batch, he/she must use one of the products within the batch If a registrant chooses to rely upon as the test material. previously submitted acute toxicity data, he/she may do so provided that the data base is complete and valid by today's standards (see acceptance criteria attached), the formulation tested is considered by EPA to be similar for acute toxicity, and the formulation has not been significantly altered since submission and acceptance of the acute toxicity data. Regardless of whether new data is generated or existing data is referenced, registrants must clearly identify the test material by EPA Registration Number.

In deciding how to meet the product specific data requirements, registrants must follow the directions given in the Data Call-In Notice and its attachments appended to the RED. The DCI Notice contains two response forms which are to be completed and submitted to the Agency within 90 days of receipt. The first form, "Data Call-In Response," asks whether the registrant will meet the data requirements for each product. The second form, "Requirements Status and Registrant's Response," lists the product specific data required for each product, including the standard six acute toxicity tests. A registrant who wishes to participate in a

batch must decide whether he/she will provide the data or depend on someone else to do so. If a registrant supplies the data to support a batch of products, he/she must select one of the following options: Developing Data (Option 1), Submitting an Existing Study (Option 4), Upgrading an Existing Study (Option 5) or Citing an Existing Study (Option 6). If a registrant depends on another's data, he/she must choose among: Cost Sharing (Option 2), Offers to Cost Share (Option 3) or Citing an Existing Study (Option 6). If a registrant does not want to participate in a batch, the choices are Options 1, 4, 5 or 6. However, a registrant should know that choosing not to participate in a batch does not preclude other registrants in the batch from citing his/her studies and offering to cost share (Option 3) those studies.

Soap salts refer to the active ingredients potassium salts of fatty acids and ammonium salts of fatty acids. Batches 1,2,3, and 4 (Table 1) consist of products that have potassium salts of fatty acids as the active ingredient. Batch 5 (Table 2) consists of two products that have ammonium salts of fatty acids as the active ingredient.

Table 1

Batch	EPA Reg. No.	<pre>† Potassium Salts of Fatty Acids</pre>	Formulation Type
	239-2564	2.0%	Ready-To-Use Solution
1	36488-32	2.0%	Ready-To-Use Solution
	36488-33	1.5%	Ready-To-Use Solution
	36488-36	2.0%	Ready-To-Use Solution
į.	42697-02	2.0%	Ready-To-Use Solution
	42697-10	2.0%	Ready-To-Use Solution
	42697-11	. 1.5%	Ready-To-Use Solution
	42697-13	2.0%	Ready-To-Use Solution
	42697-16	1.5%	Ready-To-Use Solution
	42697-22	3.0%	Ready-To-Use Solution
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	36488-31	25.0%	Emulsifiable Conc.
2	42697-06	25.0%	Ready-To-Use Solution
	42697-35	18.0%	Emulsifiable Conc.
	53219-05	18.0%	Emulsifiable Conc.

	42697-01	49.0%	Soluble Conc.
3	42697-15	50.5%	Soluble Conc.
	53219-06	49.0%	Soluble Conc.
	42697-07	40.0%	Soluble Conc.
4	53219-04	40.0%	Soluble Conc.

Table 2

Batch	EPA Reg. No.	t Ammonium Salts of Fatty Acids	Formulation Type
_	400-383	15.0%	Flowable Conc.
`5	400-429	15.0%	Soluble Conc.

Table 3 lists those products the Agency was unable to batch. These products were either considered not to be similar to other products for purposes of acute toxicity or the Agency lacked sufficient information for decision making.

Table 3

UNBATCHED	PRODUCTS CONTAINING SOAP SALTS	AS THE ACTIVE
EPA Reg. No.	% Active Ingredients	Formulation Type
42697-33	0.07% - pyrethrum extract 2.05% - potassium salts of fatty acids	Soluble Conc.
42697-34	1.40% - purified pyrethrum extract 41.00% - potassium salts of fatty acids	Soluble Conc.

000239 CHEVRON CHEMICAL COMPANY 000400 UNIROYAL CHEMICAL CO INC 036488 DELTA ANALYTICAL CORP 042697 DELTA ANALYTICAL CORP 053219 MYCOGEN CORPORATION	Co. Nr. Company Name	LIS	
REGISTRATION & REGULATORY AFFAIRS 940 HENSLEY 74 AMITY RD AGENT FOR: ATTACK PESTICIDES 1414 FENUIC AGENT FOR: SAFER INC 5451 OBERLE	Additional Name Address	LIST OF ALL REGISTRANTS SENT THIS DATA Case # and Name: 4083 Soap	United States Environmental Pr Washington, D. C. 2
940 HENSLEY STREET RICHMOND CA 74 AMITY RD BETHANY CT 1414 FENUICK LN SILVER SPRINGS ND 1414 FENUICK LN SILVER SPRINGS ND 5451 OBERLIN DR. SAN DIEGO CA	ress City & State	DATA CALL-IN NOTICE Soap salts	- FT .
94804 06524 0 20910 0 20910 92121	te Zip		

ATTACHMENT F LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

ATTACHMENT G COST SHARE AND DATA COMPENSATION FORMS



United States Environmental Protection Agency Washington, DC 20460

CERTIFICATION WITH RESPECT TO DATA COMPENSATION REQUIREMENTS Approval Expires 12-31-92

Form Approved

OMB No. 2070-0104

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M. St., S.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Please fill in blanks below. Company Name Company Number Chemical Name EPA Chemical Number I Certify that: 1. For each study cited in support of reregistration under the Federal Insecticide, Funcicide and Rodenticide Act (FIFRA) that is an exclusive use study. I am the original data submitter, or I have obtained the written permission of the original data submitter to cite that study. 2. That for each study cited in support of reregistration under FIFRA that is NOT an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter, or I have notified in writing the company(les) that submitted data I have cited and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(D) and 3(c)(2)(D) of FIFRA; and (b) Commence negotiation to determine which data are subject to the compensation requirement of FIFRA and the amount of compensation due, if any. The companies I have notified are: (check one) All companies on the data submitters' list for he active incredient listed on this form (Cite-All Method or Cite-All option under the Selective Method). (Also sign the General Offer to Pay below.) 1 The companies who have submitted the studies listed on the back of this form or attached. sheets, or indicated on the attached "Requirements Status and Registrants' Response Form," That I have previously compiled with section 3(c)(1)(D) of FIFRA for the studies I have cited in support of rerecistration under FIFRA. Date Signature Name and Title (Please Type or Print) GENERAL OFFER TO PAY: I hereby offer and agree to pay compensation to other persons, with regard to the reregistration of my products, to th extent required by FIFRA section 3(c)(1)(0) and 3(c)(2)(0). Signature Date Name and Title (Please Type or Print)



United States Environmental Protection Agency Washington, DC 20460

CERTIFICATION OF OFFER TO COST SHARE IN THE DEVELOPMENT OF DATA Approval Expires 12-31-92

Form Approved OMB No. 2070-0106

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other

Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W of Management and Budget, Paperwork Reduction Project (2070-0106),	., Washington, DC 20460; and to the Office
Please fill in blanks below.	Company Number
Company Name	Company Number
Chemical Name	EPA Chemical Number
Certify that: My company is willing to develop and submit the data required by E	EPA under the authority of the Federal
Insecticide, Fungicide and Rodenticide Act (FIFRA), if necessary. Insecticide an agreement with one or more registrants to develop journal.	However, my company would prefer to
My firm has offered in writing to enter into such an agreement. The offer to be bound by arbitration decision under section 3(c)(2)(B) terms could not be reached otherwise. This offer was made to the date(s):)(iii) of FIFRA if final agreement on all
Name of Firm(s)	Date of Offer
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enification:	
cently that I am duly authorized to represent the company named above, his form and all attachments therein are true, accurate, and complete. I a histeading statement may be punishable by fine or imprisonment or both	cknowledge that any knowingly false or
Signature of Company's Authorized Representative	Date
Name and Title (Please Type or Print)	