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Reregistration 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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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
LC_{50}	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.
LD_{50}	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]

[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_{18} saturated and C_{18} 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: [C_{12}-C_{18} H_x-H_y O_x-O_y]K

2. Chemical Name: Ammonium salts of higher fatty acids [C_8-C_{18} saturated and C_{18} unsaturated], including ammonium oleate.

CAS Registry Number: 84776-33-0

Office of Pesticide Programs Chemical Code: 031801

Empirical Formula: [C_8-C_{18} H_x-H_y O_x-O_y]NH_4

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 C_{12}-C_{18}, 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 C_{12}-C_{18} 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 C_{18} unsaturated] fatty acids, including potassium laureate, potassium myristate, potassium oleate, and potassium ricinoleate.

The technical grade of the active ingredient (TGAI) per se 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

ACUTE TOXICITY DATA

TEST	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_{18} 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 CO_2 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	Date	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 Daphnia magna.

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	Date	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 Avian Oral					
Bobwhite	TEP	94240004	Supplemental	Reuter	LD50= >2,250 mg/kg
	TGAI	94240004	Core	Reuter	LD50= >2,000 mg/kg
Mallard Duck	TGAI	00096639B	Supplemental	Safer	LD50= >2,510 mg/kg
	TGAI	00096639A	Supplemental	Safer	LD50= >2,510 mg/kg

The acceptable subacute dietary toxicity studies are listed below:

Data 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 Daphnia magna.

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
Daphnia	TGAI	00096638	Supplemental	Safer	LC50 = 102 ppm
Daphnia	TGAI	400662-00	Core	Reuter	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 Daphnia 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	Date	MRID No.	
Analytical BioChem.Lab.	1985	00157473	
Applied Bio. Science Lab.	1981	00096637	
Applied Bio. Science Lab.	1981	00096636	
Obenchain	1986	40066200	(2 studies)

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
AQUATIC TESTING					
72-1 Freshwater Fish					
Trout	TGAI	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	LC50= 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

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
USES ELIGIBLE FOR REREGISTRATION										
FOOD/FEED USES										
Grass Forage/Fodder/Hay Use Groups: Terrestrial Feed										
Perimeter, when needed, Hand held Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Grass Forage/Fodder/Hay Use Groups: Terrestrial Feed										
Perimeter, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Nongrass Forage/Fodder/Straw/Hay Use Groups: Terrestrial Feed										
Perimeter, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Nongrass Forage/Fodder/Straw/Hay Use Groups: Terrestrial Feed										
Perimeter, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Cereal Grains Use Groups: Terrestrial Food+Feed										
Perimeter, when needed, Hand held Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Cereal Grains Use Groups: Terrestrial Food+Feed										
Perimeter, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Field Crops Use Groups: Terrestrial Food+Feed										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Field Crops Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Field Crops Use Groups: Terrestrial Food+Feed										
Spray, when needed, Power Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
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
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Fruits (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Tank Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
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
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Orchards (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Tank-type	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Vegetables (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Vegetables (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Vegetables (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Vegetables (Unspecified) Use Groups: Terrestrial Food+Feed										
Spray, when needed, Power Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	.7	Not specified	Not specified	Not specified	Not specified
Vegetables (Unspecified) Use Groups: Terrestrial Feed+Feed										
Spray, when needed, Tank-type Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Power Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Tank-type Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental Herbaceous Plants Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Herbaceous Plants Use Groups: Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Lawns and Turf Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Lawns and Turf Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Lawns and Turf Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Tank-type Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Bark treatment, Nurserystock,Brush	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Wood Shrubs and Vines Use Groups: Terrestrial Non-Food										
Bark treatment, when needed, Brush	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Power Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food										
Spray, Foliar, Pump Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food+Outdoor Residential										
Bark treatment, when needed, Brush	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	1:1	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Tank-type Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Outdoor Residential										
Bark treatment, when needed, Brush	SC/L	Not specified	1:1	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Outdoor Residential										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental Woody Shrubs and Vines Use Groups: Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Bark treatment, Nurserystock,Brush	SC/L	Not specified	1:1	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
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
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, when needed, Aircraft	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, when needed, Power Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food										
Spray, Nurserystock,Tank-type Sprayer	SC/L	Not specified	4 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential										
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										
Spray, when needed, Hose-end Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Terrestrial Non-Food+Outdoor Residential										
Spray, when needed, Tank-type Sprayer	SC/L	Not specified	5.33 fl oz.	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Outdoor Residential										
Bark treatment, when needed, Brush	SC/L	Not specified	1:1	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified

APPENDIX A - Case 4083, [Soap Salts] Chemical 031801 [Ammonium Salts of Fatty Acids]

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 (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
								Allowed	Disallowed	
Ornamental and/or Shade Use Groups: Outdoor Residential										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Ornamental and/or Shade Trees Use Groups: Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	7	Not specified	Not specified.	Not specified	Not specified
Household/DomesticDwellings Outdoor Premises Use Groups: Outdoor Residential										
Spray, when needed, Hand held Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	7	Not specified	Not specified	Not specified	Not specified
Household/DomesticDwellings Outdoor Premises Use Groups: Outdoor Residential										
Spray, when needed, Power Sprayer	SC/L	Not specified	1 qt	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Nonagricultural Uncultivated Areas/Soil Use Groups: Terrestrial Non-Food										
Perimeter, when needed, Hand held	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified
Nonagricultural Uncultivated Areas/Soils Use Groups: Terrestrial Non-Food										
Perimeter, when needed, Power Sprayer	SC/L	Not specified	5 Gal	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified	Not specified

Abbreviations used

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

APPENDIX A: Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

Site: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max. Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations also see Abbreviations
USES ELIGIBLE FOR REREGISTRATION											
FOOD/FEED USES											
Alfalfa	**Use Groups: Terrestrial Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Alfalfa	**Use Groups: Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Artichoke	**Use Groups: Terrestrial Food & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Asparagus	**Use Groups: Terrestrial Food**										
Spray, Postharvest, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Asparagus	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Banana	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Beans	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L RTU	24 fl. oz /100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Broccoli	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI

APPENDIX A · Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MFR Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Brussels Sprouts	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Cabbage	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Cauliflower	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Citrus Fruit	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Postharvest, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Coffee	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Cole Crop	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	24 fl oz/100 sq ft.	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Cole Crop	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Cotton (Unspecified)	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Sprayer	SC/L	2 qt A with 3 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Crops, Water	**Use Groups: Terrestrial & Greenhouse Food**										

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Maximum Application Rate	Max # Apps	Max # Apps @ Max. Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Cucumber	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	24 fl.oz./100 sq. ft.	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Cucurbit Vegetables	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Deciduous Fruit Trees (Unspecified)	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Deciduous Fruit Trees (Unspecified)	**Use Groups: Greenhouse Food**										
Spray, Foliar, Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Eggplant	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	24 fl.oz./100 sq. ft.	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Flavoring/Spice Crops	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MRID: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps.	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations also see Abbreviations
Fruiting Vegetables	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Fruiting Vegetables	**Use Groups: Terrestrial Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Fruits (Unspecified)	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Hand held Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Fruits (Unspecified)	**Use Groups: Greenhouse Food**										
Spray, Foliar, Hand held Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Grapes	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Sprayer	L-RTU	24 fl.oz./100 sq. ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Greenhouses In Use	**Use Groups: Greenhouse Food**										
Spot treatment, When needed. Hand Held Sprayer	EC	11 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed. Knapsack Sprayer	EC	11 fl.oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed. Pump Sprayer	EC	11 fl.oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Hops	**Use Groups: Terrestrial & Greenhouse Food**										

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MRI Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Leafy Vegetables	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Legume Vegetables	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Legume Vegetables	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Lettuce	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Melons	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	24 fl oz /100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Okra	**Use Groups: Terrestrial Food**										
Spray, Foliar, Pump sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Peanuts	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Peas (Unspecified)	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	24 fl oz./100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI

APPENDIX A Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MRI Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations (see Abbreviations)
Pepper	**Use Groups: Terrestrial Food**										
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Foliar. Pump Sprayer	L-RTU	24 fl oz./100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Pineapple	**Use Groups: Terrestrial & Greenhouse Food**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Pome Fruits	**Use Groups: Terrestrial Food & Feed**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Postharvest. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Potato, White/Irish	**Use Groups: Terrestrial Food & Feed**										
Spray. Foliar. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Pumpkin	**Use Groups: Terrestrial Food**										
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Foliar. Pump Sprayer	L-RTU	24 fl oz /100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Radish	**Use Groups: Terrestrial Food**										
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Rape	**Use Groups: Terrestrial Food & Feed**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Root and Tuber Vegetables	**Use Groups: Terrestrial & Greenhouse Food**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations also see Abbreviations
Root and Tuber Vegetables	**Use Groups: Terrestrial Food**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	0 days PHI
Small Fruits	**Use Groups: Terrestrial Food & Feed**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Postharvest. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Squash (Allor Unspecified)	**Use Groups: Terrestrial Food**										
Spray. Foliar. Pump Sprayer	L RTU	24 fl oz /100 sq ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Squash (Summer)	**Use Groups: Terrestrial Food**										
Spray. Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Squash (Winter)	**Use Groups: Terrestrial Food**										
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Squash (Zucchini)	**Use Groups: Terrestrial Food**										
Spray. Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Stone Fruits	**Use Groups: Terrestrial Food**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Postharvest. Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Subtropical/Tropical Fruit	**Use Groups: Terrestrial Food & Feed**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray. Postharvest. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI

APPENDIX A Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations also see Abbreviations
Tomato	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	24 fl. oz./100 sq. ft	NS	NS	NS	NS	2 days	NS	NA	NA	0 days PHI
Tree Nuts	**Use Groups: Terrestrial Food & Feed**										
Spray, Foliar, Hand Held	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
Spray, Postharvest, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Vegetables (Unspecified)	**Use Groups: Terrestrial Food**										
Spray, Foliar, Hand held Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Vegetables (Unspecified)	**Use Groups: Terrestrial & Greenhouse Food**										
Spray, Foliar, Hand held Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Spray, Foliar, Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Vegetables (Unspecified)	**Use Groups: Terrestrial Food & Feed**										
Spot Treatment, When Needed, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	0 days PHI
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	0 days PHI
Wheat	**Use Groups: Terrestrial Food & Feed**										

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray. Foliar. Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	0 days PHI
NONFOOD/NONFEED USES											
Cats (Adults/Kittens)	**Use Groups: Indoor Residential**										
Animal treatment, When needed, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Animal treatment. When needed. Pump Sprayer	SC/L	6 fl oz with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Shampoo. When needed. By hand	L-RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Commercial/Institutional/Industrial Premises/Equipment (Outdoor)	**Use Group: Terrestrial Non Food**										
Spray. When needed. Sprayer	SC/L	6 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Dogs/Canines (Adults/Puppies)	**Use Groups: Indoor Residential**										
Animal treatment. When needed. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Animal treatment. When needed. Pump Sprayer	SC/L	6 fl oz. with 1 gal water	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Shampoo. When needed. By hand	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Fencerows/Hedgerows	**Use Groups: Outdoor Residential**										
Spray. When needed. Sprayer	SC/L	6 fl oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray. When needed. Sprayer	L-RTU	32 fl oz./50 sq ft	NS	NS	NS	NS	NS	NS	NA	NA	NS
Fraser Fir (Forest/Shelterbelt)	**Use Groups: Forestry**										
Spray. Foliar. Sprayer	SC/L	3 fl oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NC	NA	NS
Greenhouse-Empty	**Use Groups: Indoor Non-Food**										
Spray. When needed. Sprayer	SC/L	6 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A **Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]**

MFI Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Household/Domestic Dwellings	**Use Groups: Indoor Residential**										
Spray. When needed. Sprayer	EC	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	14 days	NS	NA	NA	NS
Household/Domestic Dwellings Contents	**Use Groups: Indoor Residential**										
Spot treatment. When needed. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spot treatment. When needed. Pump Sprayer	SC/L	6 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spray. When needed. Sprayer	EC	2.5 fl oz with 1 gal water	NS	NS	NS	NS	14 days	NS	NA	NA	NS
Household/Domestic Dwellings Indoor Premises	**Use Groups: Indoor Residential**										
Spot treatment. When needed. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spot treatment. When needed. Pump Sprayer	SC/L	6 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Household/Domestic Dwellings Outdoor Premises	**Use Groups: Outdoor Residential**										
Spot treatment. When needed. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spray. When needed. Sprayer	SC/L	6 fl oz. wtih 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray. When needed. Sprayer	L-RTU	32 fl.oz./50 sq. ft.	NS	NS	NS	NS	NS	NS	NA	NA	NS
Ornamental Herbaceous Plants	**Use Groups: Terrestrial Non Food & Outdoor Residential**										
Soil Drench. Container. Not on Label	SC/L	2 gal with 100 gal	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment. When needed. Hand held Sprayer	EC	16 fl oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment. When needed. Knapsack Sprayer	EC	16 fl oz. with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment. When needed. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A **Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]**

SITE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spot treatment. When needed. Pump Sprayer	EC	16 fl.oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray. Foliar. Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Spray. Foliar. Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Herbaceous Plants	**Use Groups: Terrestrial & Greenhouse Non Food**										
Spot treatment. When needed. Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray. Foliar. Sprayer	SC/L	2.5 fl.oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Herbaceous Plants	**Use Groups: Greenhouse Non Food**										
Soil Drench. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Soil Drench. Container. Not on Label	SC/L	2 gal with 100 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray. Foliar. Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar. Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Herbaceous Plants	**Use Groups: Indoor Non Food**										
Spot treatment. At bloom. Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray, Foliar, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Herbaceous Plants	**Use Groups: Indoor Residential**										
Dip, Foliar, Not on Label	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Soil Drench, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Soil Drench, Container, Not on Label	SC/L	2 Tbsp with 1 qt water	NS	NS	NS	NS	30 days	NS	NA	NA	NS
Spot Treatment, Bloom, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Foliar, Hand held Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Spray, Foliar, Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz with 1 gal water	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Ornamental Lawns and Turf	**Use Groups: Terrestrial Non-Food & Outdoor Residential**										
Spot treatment, When needed, Hand Held	EC	16 fl oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Knapsack Sprayer	EC	16 fl.oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	EC	16 fl.oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, When needed, Sprayer	SC/L	4 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, When needed, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Ornamental Woody Shrubs and Vines	**Use Groups: Terrestrial Non-Food & Outdoor Residential**										
Bark Treatment, Foliar, Sprayer	SC/L	5 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Bark Treatment, When needed, Sprayer	SC/L	2.5 fl. oz. with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Soil Drench Treatment, Container, Not on Label	SC/L	2 gal with 100 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot Treatment, When needed, Hand Held	EC	16 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot Treatment, When needed, Knapsack Sprayer	EC	16 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot Treatment, When needed, Pump Sprayer	EC	16 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot Treatment, When needed, Sprayer	SC/L	4 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot Treatment, When needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Foliar, Hand held Sprayer	EC	5 fl. oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	0 days	NS	NA	NA	NS
Spray, Foliar, Power Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Sprayer	SC/L	3 fl oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spray, Early Spring, Sprayer	SC/L	1.5 fl. oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Fall, Sprayer	SC/L	5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Spring, Sprayer	SC/L	5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MFE: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations: Allowed	Geographic Limitations: Disallowed	Use Limitations also see Abbreviations
Ornamental Woody Shrubs and Vines	**Use Groups: Greenhouse Non-Food**										
Soil Drench. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Soil Drench. Container. Not on label	SC/L	2 gal with 100 gal water	NS	NS	NS	NS	N/A	NS	NA	NA	NS
Spray. Foliar, Hand held Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Power Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Woody Shrubs and Vines	**Use Group: Indoor Non Food**										
Spray. Foliar. Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Woody Shrubs and Vines	**Use Groups: Indoor Residential**										
Soil Drench. Foliar. Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Soil Drench. Container. Not on label	SC/L	2 Tbsp with 1 qt water	NS	NS	NS	NS	30 days	NS	NA	NA	NS
Spray. Foliar. Hand held Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Spray. Foliar. Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray. Foliar. Sprayer	SC/L	2.5 fl.oz with 1 gal water	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Ornamental and/or Shade Trees	**Use Groups: Terrestrial Non Food & Outdoor Residential**										
Bark Treatment. Foliar. Sprayer	SC/L	5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS

APPENDIX A Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MOR: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Bark Treatment, When needed, Sprayer	SC/L	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Bark Treatment, When needed, Sprayer	SC/L	1 qt with 3 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Bark Treatment, When needed, Sprayer	SC/L	6 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Hand held Sprayer	EC	16 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Knapsack Sprayer	EC	16 fl oz with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	EC	16 fl oz. with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, When needed, Sprayer	SC/L	4 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Foliar, Foliar, Hand held Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Spray, Foliar, Power Sprayer	EC	5 fl.oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Sprayer	SC/L	5 fl oz with 1 gal water	NS	NS	NS	NS	N/A	NS	NA	NA	NS
Spray, Early Spring, Sprayer	SC/L	1.5 fl oz. with 1 gal water	NS	NS	NS	NS	N/A	NS	NA	NA	NS
Spray, Fall, Sprayer	SC/L	5 fl oz with 1 gal water	NS	NS	NS	NS	N/A	NS	NA	NA	NS
Spray, Spring, Sprayer	SC/L	5 fl.oz with 1 gal water	NS	NS	NS	NS	N/A	NS	NA	NA	NS
Ornamental and/or Shade Trees		Use Groups: Greenhouse Non Food									

APPENDIX A - Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

MOE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Maximum Application Rate	Max # Apps	Max # Apps @ Max Rate	Max # Apps @ Max Rate	Min Interval Between Apps @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray, Foliar, Hand Held Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Power Sprayer	EC	5 fl oz with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Ornamental and/or Shade Trees	**Use Groups: Indoor Residential**										
Spray, Foliar, Hand Held Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Spray, Foliar, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	2 days	NS	NA	NA	NS
Spray, Foliar, Power Sprayer	EC	5 fl oz. with 1 gal water	NS	NS	NS	NS	5 days	NS	NA	NA	NS
Ornamental Nonflowering Plants	**Use Groups: Terrestrial & Greenhouse Non Food**										
Spot treatment, When needed, Sprayer	SC/L	2.5 fl oz with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Nonflowering Plants	**Use Groups: Indoor Non-Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Ornamental Nonflowering Plants	**Use Groups: Indoor Residential**										
Spray, Foliar, Sprayer	SC/L	2.5 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Paths/Patios	**Use Groups: Terrestrial Non Food & Outdoor Residential**										
Spray, when needed, Sprayer	SC/L	6 fl.oz with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spray, when needed, Sprayer	L-RTU	32 fl.oz./50 sq ft.	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Paved Areas (Private Roads/Sidewalks)	**Use Groups: Terrestrial Non Food & Outdoor Residential**										

APPENDIX A Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]

SITE: Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max # Appls	Max # Appls @ Max Rate	Max # Appls @ Max Rate	Min Interval Between Appls @ Max Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations (also see Abbreviations)
									Allowed	Disallowed	
Spot treatment, when needed, Hand held Sprayer	EC	16 fl.oz. with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, when needed, Knapsack Sprayer	EC	16 fl.oz. with 1 qt. water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spot treatment, when needed, Pump Sprayer	EC	16 fl.oz. with 1 qt water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, when needed, Sprayer	SC/L	6 fl.oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Paved Areas (Private Roads/Sidewalks)	**Use Groups: Outdoor Residential**										
Spot treatment, when needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	NS	NS	NA	NA	NS
Spray, when needed, Sprayer	L-RTU	32 fl.oz /50 sq. ft	NS	NS	NS	NS	NS	NS	NA	NA	NS
Pet Living/Sleeping Quarters	**Use Groups: Outdoor Residential**										
Spot treatment, When needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Pet Living/Sleeping Quarters	**Use Groups: Indoor Residential**										
Animal bedding, When needed, Pump Sprayer	L RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Animal bedding, When needed, Pump Sprayer	SC/L	6 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Animal bedding, When needed, Pump Sprayer	EC	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	14 days	NS	NA	NA	NS
Animal bedding, When needed, Not on label	EC	2.5 fl oz. with 1 gal water	NS	NS	NS	NS	14 days	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	L-RTU	Unspecified	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spot treatment, When needed, Pump Sprayer	SC/L	6 fl.oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS
Spray, When needed, Sprayer	EC	2.5 fl oz with 1 gal water	NS	NS	NS	NS	14 days	NS	NA	NA	NS
Recreational Areas	**Use Groups: Terrestrial Non-Food**										

APPENDIX A · Case 4083, [Soap Salts] Chemical 079021 [Potassium Salts of Fatty Acids]											
SITE Application Type, Application Timing, Application Equipment	Form	Maximum Application Rate	Minimum Application Rate	Max. # Apps.	Max. # Apps. @ Max. Rate	Max # Apps. @ Max. Rate	Min. Interval Between Apps. @ Max. Rate (Days)	Restricted Entry Interval (Days)	Geographic Limitations		Use Limitations also see Abbreviations
									Allowed	Disallowed	
Spray, when needed, Sprayer	SC/L	6 fl. oz. with 1 gal water	NS	NS	NS	NS	NS	NS	NA	NA	NS
Tobacco	**Use Groups: Terrestrial Non-Food**										
Spray, Foliar, Sprayer	SC/L	2.5 fl. oz. with 1 gal water	NS	NS	NS	NS	7 days	NS	NA	NA	NS

Abbreviations used

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

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. Data Requirement (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. Bibliographic citation (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	pH	94241011, 94244005 94242003, 94243001 94243002, 94243003
63-13	Stability	94241011, 94244005 94242003, 94243001 94243002, 94243003

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 00096639B 00096639A	94240004
71-2	Acute avian diet. quail	417671-13 417671-14 942400-05	00096640 00010504
72-1	Fish toxicity bluegill fish toxicity rainbow trout		00096636 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.

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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.

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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 warranted 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 SCHEDULE," 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 zinc, 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 EPA. 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 CFR 156-Labeling Requirements For Pesticides and Devices.

After July 1, 1997, all pesticide 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 (FIFRA 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

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 Data Call-In Chemical Status Sheet, 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

2. Why you believe you are exempt from the requirements listed in this Notice and in Attachment C, Requirements Status and Registrant's Response Form, (see section III-B); 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 Data Call-In Response Form, indicating your election of this option. Voluntary cancellation is item number 5 on the Data Call-In Response Form. 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 Data Call-In Response 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 Requirements Status and Registrant's Response 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 Requirements Status and Registrant's Response 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 Requirements Status and Registrant's Response Form 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 the FIFRA Accelerated Reregistration Phase 3 Technical Guidance (Attachment E) 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 "core-guideline" 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 Requirements Status and 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 Data Call-In Response Form and a Requirements Status and Registrant's Response 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.

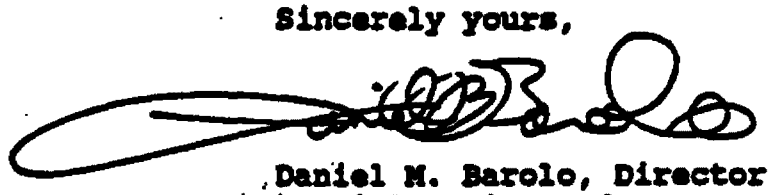
SECTION VI. INQUIRIES AND RESPONSES TO THIS NOTICE

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

All responses to this Notice (other than voluntary cancellation requests) must include a completed Data Call-In Response Form and a completed Requirements Status and Registrant's Response Form (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 Data Call-In Response Form 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.

INQUIRIES 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.

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
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

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
053219 MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA, 92121	4083 Soap salts Chemical # and Name 079021 Potassium salts of fatty acids	GENERIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and 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."	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."
53219-4 53219-5 53219-6					

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
000400 UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT, 06524	4083 Soap salts Chemical # and Name 031801 Ammonium Salts of Fatty Acids	GENERIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and 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."	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."
400-383 400-429					

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
000239 CHEVRON CHEMICAL COMPANY REGISTRATION & REGULATORY AFFAIRS D 940 HENSLEY STREET RICHMOND CA 94804	4083 Soap salts Chemical # and Name 079021 Potassium salts of fatty acids	GENERIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and 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."	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."
239-2564					

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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

1. Company name and Address 036488
DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD, 20910

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

3. Date and Type of DCI
GENERIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and 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."	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."
36488-31 36488-32 36488-33 36488-36					

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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

1. Company name and Address 042697
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD, 20910

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

3. Date and Type of DCI
GENERIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and 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."	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."
42697-1 42697-2 42697-6 42697-7 42697-10 42697-11 42697-13 42697-15 42697-16 42697-22 42697-33 42697-34 42697-35 NC83001100					

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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 form is the same for both product specific and generic data, instructions 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 generic data requirements.

EPA has developed this form individually for each data call-in addressed to each registrant, and has preprinted this form with a number of items. DO NOT 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.

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.

Item 5. 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:

A	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
O	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:

EP	End-Use Product
MP	Manufacturing-Use Product
MP/TGAI	Manufacturing-Use Product and Technical Grade Active Ingredient
PAI	Pure Active Ingredient
PAI/M	Pure Active Ingredient and Metabolites
PAI/PAIRA	Pure Active Ingredient or Pure Active Ingredient Radiolabelled
PAIRA	Pure Active Ingredient Radiolabelled
PAIRA/M	Pure Active Ingredient Radiolabelled and 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
TGAI	Technical Grade Active Ingredient
TGAI/PAI	Technical Grade Active Ingredient or Pure Active Ingredient
TGAI/PAIRA	Technical Grade Active Ingredient or Pure Active Ingredient Radiolabelled
TGAI/TEP	Technical Grade Active Ingredient or Typical End-Use Product
MET	Metabolites
IMP	Impurities
DEGR	Degradates
*	See: guideline 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.

1. (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.

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

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
053219 MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts Chemical # and Name 079021 Potassium salts of fatty acids	GENERIC

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
141-1 *	Honey bee acute contact					AC	TGAI	8 mos.	
171-3 *	Directions for use					ACH		8 mos.	

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_____

11. Date

12. Name of Company Contact

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 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.

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

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
000239 CHEVRON CHEMICAL COMPANY REGISTRATION & REGULATORY AFFAIRS DE 940 HENSLEY STREET RICHMOND CA 94804	4083 Soap salts Chemical # and Name 079021 Potassium salts of fatty acids	GENERIC

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
141-1 *	Honey bee acute contact					AC	TGAI	8 mos.	
171-3 *	Directions for use					ACH		8 mos.	

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_____

11. Date

12. Name of Company Contact

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 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.

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

1. Company name and Address 000400
UNIROYAL CHEMICAL CO INC
74 AMITY RD
BETHANY CT 06524

2. Case # and Name
4083 Soap salts
Chemical # and Name 031801
Ammonium Salts of Fatty Acids

3. Date and Type of DCI
GENERIC

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
72-1(c) *	Fish toxicity rainbow trout					AC	TGAI	8 mos.	
72-2(a) *	Invertebrate toxicity					AC	TGAI	8 mos.	
141-1 *	Honey bee acute contact					AC	TGAI	8 mos.	
171-3 *	Directions for use					AC		8 mos.	

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_____

11. Date

12. Name of Company Contact

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
031801 Ammonium Salts of Fatty Acids

GUIDELINE	COMMENT
72-1(c)	This study is required to fulfill EPA requirements as stated in subpart E, section 158.220. However, a reduced data set including only one fish study, preferably in the rainbow trout, is required for 72-1 Fish Acute LC50 in order to confirm EEB's assessment based on potassium salt data.
72-2(a)	This study is required to fulfill EPA requirements as stated in Subpart E, section 158.220 and to confirm data used in the hazard assessment.
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 applicator rates for all uses.

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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

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 042697
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

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

3. Date and Type of DCI
GENERIC

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
141-1 *	Honey bee acute contact					AC	TGAI	8 mos.	
171-3 *	Directions for use					ACH		8 mos.	

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_____

11. Date

12. Name of Company Contact

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 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.

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

1. Company name and Address 036488
DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD 20910

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

3. Date and Type of DCI
GENERIC

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
141-1 *	Honey bee acute contact					AC	TGAI	8 mos.	
171-3 *	Directions for use					ACH		8 mos.	

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_____

11. Date

12. Name of Company Contact

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 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.

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

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

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name: 4083 Soap salts

Co. Nr.	Company Name	Additional Name	Address	City & State	Zip
000239	CHEVRON CHEMICAL COMPANY	REGISTRATION & REGULATORY AFFAIRS	940 HENSLEY STREET	RICHMOND CA	94804
036488	DELTA ANALYTICAL CORP	AGENT FOR: ATTACK PESTICIDES	1414 FENWICK LN	SILVER SPRINGS MD	20910
042697	DELTA ANALYTICAL CORP	AGENT FOR: SAFER INC	1414 FENWICK LN	SILVER SPRINGS MD	20910
053219	MYCOGEN CORPORATION		5451 OBERLIN DR.	SAN DIEGO CA	92121

ATTACHMENT E

EPA ACCEPTANCE CRITERIA

SUBDIVISION D

Guideline	Study Title
Series 61	Product Identity and Composition
Series 62	Analysis and Certification of Product Ingredients
Series 63	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)
2.___ 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 $\geq$ 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
5.___ 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
7.___ 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 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, pressure, humidity) controlled in each step and the parameters that are maintained
    ____ Statement of whether process involves intended chemical reactions

8. (continued)

____ 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)

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).
2. 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).
6. 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.___ Five or more representative samples (batches in case of 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^3 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
___ 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

63-10 Dissociation Constant

___ Experimental method described
___ Temperature of measurement specified (preferably about 20 - 25° C)

63-11 Octanol/water Partition Coefficient

___ 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 pH

___ Measured at about 20 - 25° C
___ Measured following dilution or dispersion in distilled water

63-13 Stability

___ Sensitivity to metal ions and metal determined
___ Stability at normal and elevated temperatures
___ Sensitivity to sunlight determined

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.
4. Indication of melting point (in C°).
5. Indication of boiling point (in C°).
6. 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

Guideline	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.____ Identify 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.*___ 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.
10.____ 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

Does your study meet the following acceptance criteria?

1._____ Identify material tested (technical, end-use product, etc)

2._____ At least 5 animals/sex/group
3.*____ Rats 200-300 gm, rabbits 2.0-3.0 kg or guinea pigs 350-450 gm.
4._____ Dosing, single dermal.
5._____ Dosing duration at least 24 hours.
6.*____ Vehicle control, only if toxicity of vehicle is unknown.
7._____ Doses tested, sufficient to determine a toxicity category or a limit dose (2000 mg/kg).
8._____ Application site clipped or shaved at least 24 hours before dosing
9._____ Application site at least 10% of body surface area.
10._____ Application site covered with a porous nonirritating cover 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._____ Individual body weights.
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.____ At least 5 young adult rats/sex/group
4.____ Dosing, at least 4 hours by inhalation.
5.____ Chamber air flow dynamic, at least 10 air changes/hour, at least 19% oxygen content.
6.____ Chamber temperature, 22° C (±2), relative humidity 40-60%.
7.____ Monitor rate of air flow
8.____ Monitor actual concentrations of test material in breathing zone.
9.____ Monitor aerodynamic particle size for aerosols.
10.____ Doses tested, sufficient to determine a toxicity category or a limit dose (5 mg/L actual concentration of respirable substance).
11.____ Individual observations at least once a day.
12.____ Observation period to last at least 14 days.
13.____ Individual body weights.
14.____ Gross necropsy on all animals.

81-3 Acute Inhalation 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. 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.*___ 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.*____ 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

1. The form of pesticide tested, e.g., solid, liquid, percent AI in technical, end-use product, etc.
2. 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.*___ 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

1. 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
5. Reference for the specific method employed
6. 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.
8.*___ 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)
12.____ Test dose repeated if no signs of delayed neurotoxicity observed by 21 days after dosing.
13.____ Observation period 21 days after each dose.
14.____ Individual daily observations.
15.____ Individual body weights.
16.____ 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

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

Form Approved
OMB No. 2070-0108
Approval Expires 12-31-92

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, Fungicide 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(ies) 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 ingredient listed on this form (Cite-All Method or Cite-All option under the Selective Method). (Also sign the General Offer to Pay below.)

   [ ] 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."

3. That I have previously complied with section 3(c)(1)(D) of FIFRA for the studies I have cited in support of reregistration under FIFRA.

Signature	Date
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)(D) and 3(c)(2)(D).

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

Form Approved
OMB No. 2070-0106
Approval Expires 12-31-92

Please fill in blanks below.

Company Name	Company Number

Chemical Name	EPA Chemical Number

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration decision under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)	Date of Offer

Certification:

I certify that I am duly authorized to represent the company named above, and that the statements that I have made on this form and all attachments therein are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative	Date

Name and Title (Please Type or Print)

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 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 product specific data, (4) Attachment D, EPA Grouping of End-Use Products for Meeting Acute Toxicology Data Requirements for Reregistration, (5) Attachment E, EPA Acceptance Criteria, (6) Attachment F, List of All Registrant(s) sent this Data Call-In Notice, and (7) Attachment G, the Cost Share and Data Compensation Forms for product specific data, and Product Specific 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 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.

INQUIRIES AND RESPONSES TO THIS NOTICE

If you have any questions regarding the product specific data requirements 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.

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

DATA CALL-IN 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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT 06524	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
400-383		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT 06524	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
400-429		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
CHEVRON CHEMICAL COMPANY REGISTRATION & REGULATORY AFFAIRS DE 940 HENSLEY STREET RICHMOND CA 94804	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
239-2564		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
36488-36		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
36488-33		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
36488-32		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN RESPONSE

Form Approved
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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	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
36488-31		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-1		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-2		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-6		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a RUP and I agree to satisfy the RUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-7		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-10		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-11		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN RESPONSE

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-13		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN RESPONSE

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-15		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-16		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN RESPONSE

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-22		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

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

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a RUP and I agree to satisfy the RUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-33		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

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Washington, D. C. 20460

DATA CALL-IN RESPONSE

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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

3. Date and Type of DCI
PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-34		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
42697-35		N.A.	N.A.		

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_____

9. Date

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Washington, D. C. 20460

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

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
NC83001100		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
53219-4		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN 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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
53219-5		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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

DATA CALL-IN RESPONSE

Form Approved
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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	2. Case # and Name	3. Date and Type of DCI
MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	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."
53219-6		N.A.	N.A.		

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_____

9. Date

10. Name of Company Contact

11. Phone Number

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. I am 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 inappropriate for my product (**Waiver Request**). I am 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.

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.

1. Company name and Address
UNIROYAL CHEMICAL CO INC
74 AMITY RD
BETHANY CT 06524

2. Case # and Name
4083 Soap salts

EPA Reg. No. 400-383

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 400-RD-2317

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
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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	2. Case # and Name	3. Date and Type of DCI
UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT 06524	4083 Soap salts EPA Reg. No. 400-383	PRODUCT SPECIFIC ID# 400-RD-2317

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability (11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability (12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability					ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity (13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility (14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics					ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage (15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical								
81-1	Acute oral toxicity-rat (1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat (1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat					ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit (2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation (1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization (4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents								
96-19	Browsing animal repellents (1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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

1 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 commenly 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 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(s) if necessary.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT 06524	4083 Soap salts EPA Reg. No. 400-429	PRODUCT SPECIFIC ID# 400-RD-2318

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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UNIROYAL CHEMICAL CO INC 74 AMITY RD BETHANY CT 06524	4083 Soap salts EPA Reg. No. 400-429	PRODUCT SPECIFIC ID# 400-RD-2318

4. Guideline Requirement Number	5. Study Title		DCI-GLN	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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

1 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 commenly 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 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(s) if necessary.

1. Company name and Address
CHEVRON CHEMICAL COMPANY
REGISTRATION & REGULATORY AFFAIRS DE
940 HENSLEY STREET
RICHMOND CA 94804

2. Case # and Name
4083 Soap salts

EPA Reg. No. 239-2564

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 239-RD-2319

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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OMB No. 2070-0107
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CHEVRON CHEMICAL COMPANY
REGISTRATION & REGULATORY AFFAIRS DE
940 HENSLEY STREET
RICHMOND CA 94804

2. Case # and Name
4083 Soap salts

EPA Reg. No. 239-2564

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 239-RD-2319

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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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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(s) if necessary.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 36488-36

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 36488-RD-2323

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials,(1,2) production & formulation proc					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 36488-36	PRODUCT SPECIFIC ID# 36488-RD-2323

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	<u>Acute Toxic - Regular Chemical</u>									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
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81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	<u>Efficacy - Vertebrate Control Agents</u>									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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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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12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
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Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
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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 prior to initiation of studies.

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

1 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 commonly 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 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(s) if necessary.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 36488-33	PRODUCT SPECIFIC ID# 36488-RD-2322

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 36488-33

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 36488-RD-2322

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	<u>Acute Toxic - Regular Chemical</u>									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	<u>Efficacy - Vertebrate Control Agents</u>									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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 1 on the basis of potential eye and dermal irritation effects.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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

1 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 commonly 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 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

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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: ATTACK PESTICIDES
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 36488-32

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 36488-RD-2321

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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.

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1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 36488-32

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 36488-RD-2321

4. Guideline Requirement Number	5. Study Title		Confirmatory	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
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K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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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 prior to initiation of studies.

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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DELTA ANALYTICAL CORP AGENT FOR: ATTACK PESTICIDES 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 36488-31	PRODUCT SPECIFIC ID# 36488-RD-2320

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
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63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

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4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
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81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
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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 prior to initiation of studies.

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

1 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 commonly 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 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(s) if necessary.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-1

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2324

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-1

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2324

4. Guideline Requirement Number	5. Study Title		FORMULATION	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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

1 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 commenly 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 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
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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-2

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2325

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials,(1,2) production & formulation proc					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of (1,3) impurities					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

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AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-2

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2325

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability (11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability (12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability					ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity (13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility (14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics					ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage (15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical								
81-1	Acute oral toxicity-rat (1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat (1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat					ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit (2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation (1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization (4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents								
96-19	Browsing animal repellents (1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

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A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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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 prior to initiation of studies.

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-6

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2326

4. Guideline Requirement Number	5. Study Title	Reserved	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials,(1,2) production & formulation proc					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
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63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

10. Certification

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Signature and Title of Company's Authorized Representative_____

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Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-6

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2326

4. Guideline Requirement Number	5. Study Title	Data Gap	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability (11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability (12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability					ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity (13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility (14)					ABC HIJK M O	MP/EP	8 mos.	
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81-1	Acute oral toxicity-rat (1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
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81-6	Dermal sensitization (4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents								
96-19	Browsing animal repellents (1)					ABC K	EP	8 mos.	

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Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

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14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
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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 prior to initiation of studies.

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

1 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 commenly 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 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(s) if necessary.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-7

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2327

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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1414 FENWICK LN
SILVER SPRINGS MD 20910

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EPA Reg. No. 42697-7

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PRODUCT SPECIFIC
ID# 42697-RD-2327

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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 effect 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 prior to initiation of studies.

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

1 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 commenly 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 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

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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-10

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2328

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

10. Certification

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AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-10

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2328

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
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63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
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81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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5 Certified limits are not required for inert ingredients in productt proposed for experimental use.
9 Required if test substances are disperaible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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 affert the visual system. Registrants should consult with the agency for development of protocols and methodology

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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 prior to initiation of studies.

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-11	PRODUCT SPECIFIC ID# 42697-RD-2329

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials,(1,2) production & formulation proc					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
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63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
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63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
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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 _____

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United States Environmental Protection Agency
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1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-11

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2329

4. Guideline Requirement Number	5. Study Title		Reviewed	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
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63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
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81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

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12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable 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.):

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.

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 certifiec 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

1 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 commenly 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 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(s) if necessary.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-13

3. Date and Type of OCI
PRODUCT SPECIFIC
ID# 42697-RD-2330

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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 _____

11. Date

12. Name of Company Contact

13. Phone Number

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-13

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2330

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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 certifiec 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

1 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 commenly 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 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 12-31-9

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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-15	PRODUCT SPECIFIC ID# 42697-RD-2331

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-15

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2331

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

Footnotes (cont.):

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

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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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 PENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-16	PRODUCT SPECIFIC ID# 42697-RD-2332

4. Guideline Requirement Number	5. Study Title	Record	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials,(1,2) production & formulation proc					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
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63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
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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_____

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DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-16	PRODUCT SPECIFIC ID# 42697-RD-2332

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern		7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC	HIJK M O	MP/EP	8 mos.	
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63-19	Miscibility	(14)					ABC	HIJK M O	MP/EP	8 mos.	
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81-1	Acute oral toxicity-rat	(1,36,37)					ABC	HIJK M O	MP/EP	8 mos.	
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81-6	Dermal sensitization	(4)					ABC	HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents										
96-19	Browsing animal repellents	(1)					ABC	K	EP	8 mos.	

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
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15 Required if end-use product is liquid and is to be used around electrical equipment.

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1 Not required if test material is a gas or highly volatile.
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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 prior to initiation of studies.

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

1 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 commenly 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 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(s) if necessary.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-22	PRODUCT SPECIFIC ID# 42697-RD-2333

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-22

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2333

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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; TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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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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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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 prior to initiation of studies.

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 certifi 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

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

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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.

1. Company name and Address
DELTA ANALYTICAL CORP
AGENT FOR: SAFER INC
1414 FENWICK LN
SILVER SPRINGS MD 20910

2. Case # and Name
4083 Soap salts

EPA Reg. No. 42697-33

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 42697-RD-2334

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical									
61-1	Product identity & composition	(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities	(1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis	(1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits	(1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method	(1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color						ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state						ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor						ABC HIJK M O	MP/EP	8 mos.	
63-7	Density						ABC HIJK M O	MP/EP	8 mos.	
63-12	pH	(9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action	(10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

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4. Guideline Requirement Number	5. Study Title		VOLUNTARY	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
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81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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

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

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

Footnotes (cont.):

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

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1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-34	PRODUCT SPECIFIC ID# 42697-RD-2335

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical									
61-1	Product identity & composition	(1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities	(1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis	(1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits	(1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method	(1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color						ABC HIJK M O	MP/EP	8 mos.	
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63-7	Density						ABC HIJK M O	MP/EP	8 mos.	
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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.

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4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
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81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

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FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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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 prior to initiation of studies.

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 certifi 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

1 The agency has waived all requirements to submit efficacy data for vertebrate control agents unless the pesticide product bears a claim to control vertebrates (suc as rodents, birds, bats, canids, and skunks) that may directly or indirectly transmit diseases to humans. However, each registrant must ensure through testing tha his products are efficacious when used in accordance with label directions and commenly 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 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(s) if necessary.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-35	PRODUCT SPECIFIC ID# 42697-RD-2336

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
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DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. 42697-35	PRODUCT SPECIFIC ID# 42697-RD-2336

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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 cit 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.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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.

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 certifiec 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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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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. NC83001100	PRODUCT SPECIFIC ID# 42697-RD-2337

4. Guideline Requirement Number	5. Study Title	Confidential	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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 _____

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United States Environmental Protection Agency
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DELTA ANALYTICAL CORP AGENT FOR: SAFER INC 1414 FENWICK LN SILVER SPRINGS MD 20910	4083 Soap salts EPA Reg. No. NC83001100	PRODUCT SPECIFIC ID# 42697-RD-2337

4. Guideline Requirement Number	5. Study Title		Voluntary	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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

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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 prior to initiation of studies.

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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 12-31-9

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.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts EPA Reg. No. 53219-4	PRODUCT SPECIFIC ID# 53219-RD-2338

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

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Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
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1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts EPA Reg. No. 53219-4	PRODUCT SPECIFIC ID# 53219-RD-2338

4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
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63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	Acute Toxic - Regular Chemical									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
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81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
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81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	Efficacy - Vertebrate Control Agents									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

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Washington, D. C. 20460

FOOTNOTES AND KEY DEFINATIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 4083 Soap salts

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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 methodolog prior to initiation of studies.

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 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).

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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(s) if necessary.

1. Company name and Address
MYCOGEN CORPORATION
5451 OBERLIN DR.
SAN DIEGO CA 92121

2. Case # and Name
4083 Soap salts

EPA Reg. No. 53219-5

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 53219-RD-2339

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
61-2(b)	Discussion of formation of impurities (1,3)					ABC HIJK M O	MP/EP	8 mos.	
62-1	Preliminary analysis (1,4)					ABC HIJK M O	MP/EP	8 mos.	
62-2	Certification of limits (1,5)					ABC HIJK M O	MP/EP	8 mos.	
62-3	Analytical method (1)					ABC HIJK M O	MP/EP	8 mos.	
63-2	Color					ABC HIJK M O	MP/EP	8 mos.	
63-3	Physical state					ABC HIJK M O	MP/EP	8 mos.	
63-4	Odor					ABC HIJK M O	MP/EP	8 mos.	
63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
63-12	pH (9)					ABC HIJK M O	MP/EP	8 mos.	
63-14	Oxidizing or reducing action (10)					ABC HIJK M O	MP/EP	8 mos.	

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_____

11. Date

12. Name of Company Contact

13. Phone Number

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

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4. Guideline Requirement Number	5. Study Title		Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
63-15	Flammability	(11)					ABC HIJK M O	MP/EP	8 mos.	
63-16	Explodability	(12)					ABC HIJK M O	MP/EP	8 mos.	
63-17	Storage stability						ABC HIJK M O	MP/EP	8 mos.	
63-18	Viscosity	(13)					ABC HIJK M O	MP/EP	8 mos.	
63-19	Miscibility	(14)					ABC HIJK M O	MP/EP	8 mos.	
63-20	Corrosion characteristics						ABC HIJK M O	MP/EP	8 mos.	
63-21	Dielectric breakdown voltage	(15)					ABC HIJK M O	EP	8 mos.	
	<u>Acute Toxic - Regular Chemical</u>									
81-1	Acute oral toxicity-rat	(1,36,37)					ABC HIJK M O	MP/EP	8 mos.	
81-2	Acute dermal toxicity-rabbit/rat	(1,2,37)					ABC HIJK M O	MP/EP	8 mos.	
81-3	Acute inhalation toxicity-rat						ABC HIJK M O	MP/EP	8 mos.	
81-4	Primary eye irritation-rabbit	(2)					ABC HIJK M O	MP/EP	8 mos.	
81-5	Primary dermal irritation	(1,2)					ABC HIJK M O	MP/EP	8 mos.	
81-6	Dermal sensitization	(4)					ABC HIJK M O	MP/EP	8 mos.	
	<u>Efficacy - Vertebrate Control Agents</u>									
96-19	Browsing animal repellents	(1)					ABC K	EP	8 mos.	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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

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 cit 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.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

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

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).
2 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.
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 the extent this information is available.
4 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 rudimentary product analytical method and data will suffice to support an experimental use permit.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
14 Required if product is an emulsifiable liquid and is to be diluted with petroleum solvents.
15 Required if end-use product is liquid and is to be used around electrical equipment.

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 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.
4 Required unless repeated dermal exposure does not occur under conditions of use.
36 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
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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 prior to initiation of studies.

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

1 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 commenly 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.

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MYCOGEN CORPORATION 5451 OBERLIN DR. SAN DIEGO CA 92121	4083 Soap salts EPA Reg. No. 53219-6	PRODUCT SPECIFIC ID# 53219-RD-2340

4. Guideline Requirement Number	5. Study Title	Protocol	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
61-1	Product identity & composition (1)					ABC HIJK M O	MP/EP	8 mos.	
61-2(a)	Descrip of starting materials, production & formulation proc (1,2)					ABC HIJK M O	MP/EP	8 mos.	
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63-7	Density					ABC HIJK M O	MP/EP	8 mos.	
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United States Environmental Protection Agency
Washington, D. C. 20460

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Case # and Name: 4083 Soap salts

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

JUL 29 1986

PR NOTICE 86-5

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

NOTICE TO PRODUCERS, FORMULATORS, DISTRIBUTORS AND REGISTRANTS

Attention: Persons responsible for Federal registration of pesticides.

Subject: Standard format for data submitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and certain provisions of the Federal Food, Drug, and Cosmetic 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 FIFRA and FFDCA. These data are defined in FIFRA §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 FR 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 confidentiality. No entitlements to data confidentiality are changed, either by 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 86-4 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 screen 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 data 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 submitted 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.

- INDEX -

****

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 [illegible] 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 in 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. Safety Studies. 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 FIFRA §10(d)(1)(A), (B), or (C), and if so must be handled as described in section D.3. of this notice.

c. 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 Required	Example
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. (When flagging requirements are finalized.)	
Body of Study	Always - with an English language translation if required.	
Study Appendices	At submitter's option	
Cover Sheet to Confidential Attachment	If CBI is claimed under FIFRA §10(d)(1)(A), (B), or (C)	
CBI Attachment	If CBI is claimed under FIFRA §10(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 primary 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. Performing Laboratory Identification. 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. Facts of Publication. 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 Pg 13).

D.3. Confidential Attachment

If the claim is made that a study includes confidential business information as defined by the criteria of FIFRA §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 CBI 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 identifying 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. Supplemental 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. Good 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:

- Do not include frayed or torn pages.
- Do not include carbon copies, or copies in other than black ink.
- Make sure that photocopies are clear, complete, and fully readable.
- Do not include oversize computer printouts or fold-out pages.
- Do not bind any documents with glue or binding tapes.
- 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 four copies, from one of which all material claimed as CBI 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.

- Remove the 'Supplemental Statement of Data Confidentiality Claims'.
- 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.
- 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).

James W. Akerman
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**)

†Smith Chemical Corporation 1234 West Smith Street Cincinnati, OH 98765	-and-	Jones Chemical Company 5678 Wilson Blvd 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
(X is the total number of pages in the study)

ATTACHMENT 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

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA §10(d)(1)(A), (B), or (C).

Company _____

Company Agent: _____ Typed Name _____ Date: _____

_____ Title _____ _____ Signature _____

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

STATEMENT OF DATA CONFIDENTIALITY CLAIMS

Information claimed confidential on the basis of its falling within the scope of FIFRA §10(d)(1)(A), (B), or (C) has been removed to a confidential appendix, and is cited by cross-reference number in the body of the study.

Company: _____

Company Agent: _____ Typed Name _____ Date: _____

_____ Title _____ _____ 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 waives 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 made, to the submitter, to obtain the confidentiality waiver 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.
- Cite the reasons why the cited passage qualifies for confidential treatment.
- 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.
- 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.
- 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.

ATTACHMENT 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 used in the study in place of the following words or phrase at the indicated volume and page references.

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	"	"
100	19	"	"

Example 2 (Confidential paragraph(s) that have been deleted from the study)

CROSS REFERENCE NUMBER 5 This cross reference number is used in the study in place of the following paragraph(s) at the indicated volume and page references.

DELETED PARAGRAPH(S):

(Reproduce the deleted paragraph(s) here)

PAGE	LINES	REASON FOR THE DELETION	FIFRA REFERENCE
20	8-17	Description of the quality control process	§10(d)(1)(C)

Example 3 (Confidential pages that have been deleted from the study)

CROSS REFERENCE NUMBER 7 This cross reference number noted on a place-holder page is used in place of the following whole pages at the indicated volume and page references.

DELETED PAGE(S): are attached immediately behind this page.

PAGE(S)	REASON FOR THE DELETION	FIFRA REFERENCE
39-41	Description of product manufacturing process	§10(d)(1)(A)

ATTACHMENT 6.

SAMPLE GOOD LABORATORY PRACTICE STATEMENTS

Example 1.

This study meets the requirements for 40 CFR Part 160

Submitter _____

Sponsor _____

Study Director _____

Example 2.

This study does not meet the requirements of 40 CFR Part 160, and differs in the following ways:

1. _____

2. _____

3. _____

Submitter _____

Sponsor _____

Study Director _____

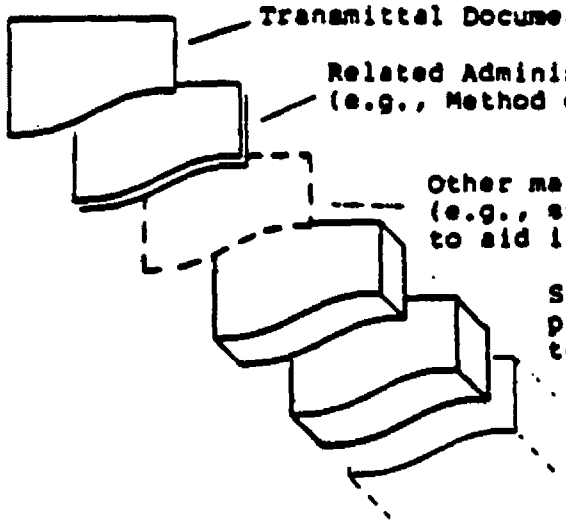
Example 3.

The submitter of this study was neither the sponsor of this study nor conducted it, and does not know whether it has been conducted in accordance with 40 CFR Part 160.

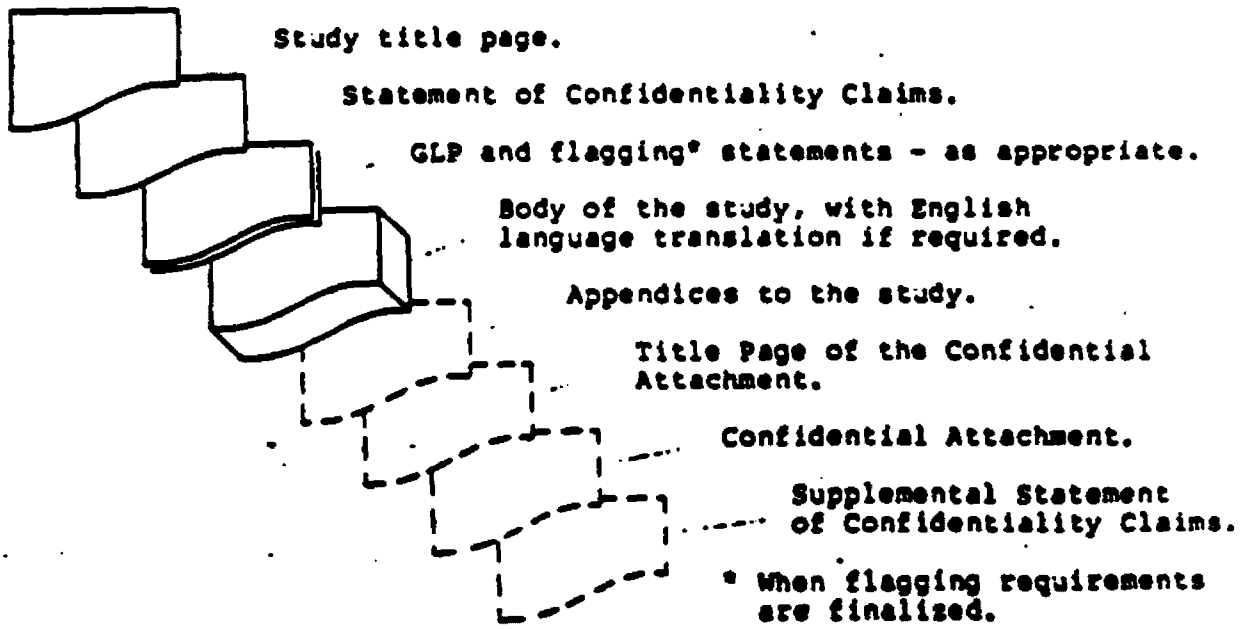
Submitter _____

ATTACHMENT 7.

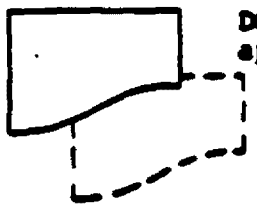
FORMAT OF THE SUBMITTAL PACKAGE



FORMAT OF SUBMITTED STUDIES



LEGEND



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 effort 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 soap 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 that batch. It is the registrants' option to participate in the 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 as the test material. If a registrant chooses to rely upon 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.	% Potassium Salts of Fatty Acids	Formulation Type
1	239-2564	2.0%	Ready-To-Use Solution
	36488-32	2.0%	Ready-To-Use Solution
	36488-33	1.5%	Ready-To-Use Solution
	36488-36	2.0%	Ready-To-Use Solution
	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
2	36488-31	25.0%	Emulsifiable Conc.
	42697-06	25.0%	Ready-To-Use Solution
	42697-35	18.0%	Emulsifiable Conc.
	53219-05	18.0%	Emulsifiable Conc.

3	42697-01	49.0%	Soluble Conc.
	42697-15	50.5%	Soluble Conc.
	53219-06	49.0%	Soluble Conc.
4	42697-07	40.0%	Soluble Conc.
	53219-04	40.0%	Soluble Conc.

Table 2

Batch	EPA Reg. No.	% Ammonium Salts of Fatty Acids	Formulation Type
5	400-383	15.0%	Flowable Conc.
	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.

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

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name: 4083 Soap salts

Co. Nr.	Company Name	Additional Name	Address	City & State	Zip
000239	CHEVRON CHEMICAL COMPANY	REGISTRATION & REGULATORY AFFAIRS	940 HENSLEY STREET	RICHMOND CA	94804
000400	UNIROYAL CHEMICAL CO INC		74 AMITY RD	BETHANY CT	06524
036488	DELTA ANALYTICAL CORP	AGENT FOR: ATTACK PESTICIDES	1414 FENWICK LN	SILVER SPRINGS MD	20910
042697	DELTA ANALYTICAL CORP	AGENT FOR: SAFER INC	1414 FENWICK LN	SILVER SPRINGS MD	20910
053219	MYCOGEN CORPORATION		5451 OBERLIN DR.	SAN DIEGO CA	92121

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

Form Approved
OMB No. 2070-0106
Approval Expires 12-31-92

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, Fungicide 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(ies) 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 ingredient listed on this form (Cite-All Method or Cite-All option under the Selective Method). (Also sign the General Offer to Pay below.)

   [ ] 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."

3. That I have previously complied with section 3(c)(1)(D) of FIFRA for the studies I have cited in support of reregistration under FIFRA.

Signature	Date
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)(D) and 3(c)(2)(D).

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

Form Approved
OMB No. 2070-0106
Approval Expires 12-31-92

Please fill in blanks below.

Company Name	Company Number
Chemical Name	**EPA Chemical Number**

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration decision under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)	Date of Offer

Certification:

I certify that I am duly authorized to represent the company named above, and that the statements that I have made on this form and all attachments therein are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative	Date
Name and Title (Please Type or Print)	

EPA Form 8570-32