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

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

MEMORANDUM

11/19/2018

SUBJECT: Product Chemistry Review for ***Ultra Palmolive Antibacterial Dish Liquid***
EPA Reg. No.: 4582-72, DP 449716

FROM: Salvador Rodriguez, chemist
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THRU: Karen Hicks, Team Leader
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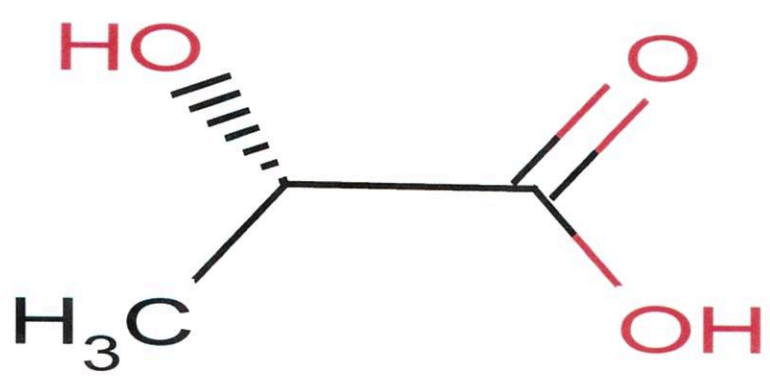
TO: Jacqueline Hardy, PM Team 34 / Stacey Grigsby
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: Colgate Palmolive
Action code:362

Agency Due Date: 12/25/2018
Science Due Date: 11/8/2018
Submission No.: 1025204
E-Sub No.: 32671
Classification: EP
Process: Nonintegrated system
Pesticide classification: Disinfectant & bactericide.

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
128929	79-33-4	Lactic acid	2.00



11/20/18

I. BACKGROUND

The Registrant, Colgate Palmolive, has submitted a minor formulation amendment and a response to Chemistry Review, for their product: ***Ultra Palmolive Antibacterial Dish Liquid*** EPA Reg. No. 4582-72.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	☒	☐
EPA FORM 8570-27 – Formulator's Exemption Statement	☐	☒
EPA FORM 8570-34 – Certification with respect to citation of data	☐	☒
EPA FORM 8570-35 – Data Matrix	☒	☐
Cover letter (9/26/2018)	☒	☐
Transmittal document	☐	☒
Proposed CSF Alternate #: (30) dated (10/17/2018)	☒	☐
Proposed label (7/11/2018)	☒	☐
Certification for Pilot Fragrance Notification Program	☐	☒
	☐	☐
REFERENCED: CSF BASIC Alt # 29, (7/3/2018)	--	
Comments:		

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	EUP	Food use	**Non-food use**
Non-integrated	☐	☐	☒	☐	☒
Integrated	☐	☐	☐		

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Lactic acid	2.00	2.10	1.80

	Acceptable	Not Acceptable	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	☒	☐	☐
2. Wider certified limits were requested, and rationale was accepted	☐	☐	☒
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	☒	☐	☐
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	☒	☐	☐
5. All inert ingredients are approved for non-food use pesticide formulations.	☒	☐	☐
6. The impurities present >0.1% are identified.	☐	☐	☒
7. Impurities of toxicological significance have an upper certified limit.	☐	☐	☒

b. **Product Label**:

	Yes	NO	N/A
The formula contains one of the following:			
1. 10% or more of petroleum distillate	☐	☒	☐
2. 1.0% or more of methyl alcohol	☐	☒	☐
3. Sodium nitrite at any level	☐	☒	☐
4. A toxic list 1 inert at any level	☐	☒	☐
5. Arsenic in any form	☐	☒	☐
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	☐	☐	☒
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	☐	☐	☒
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	☒	☐	☐
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	☐	☐	☒

IV. Conclusion:

Product Science Branch of Antimicrobials Division finds the proposed Confidential Statement of Formula, dated 9/3/18, for the alternate #: (30) formulation, and the OPPTS Guideline series 830.1600, 830.1670, 830.6315, 830.7000 & 830.7300, supporting the disinfectant & bactericide, non-integrated, non-food, and end-use product **EPARN: 4582-72 to be acceptable**

Table A:
Series 830 guidelines – Group A

OPPTS#	Name	Status	MRID
830.1600	Description of materials	Acceptable	50675101
830.1670	Discussion of formation of impurities	Acceptable	50675101

VII. Table B:
Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6315	Flammability (° C)	132	Acceptable	50675102
830.7000	pH (1% solution.)	3.95	Acceptable	50675102
8.53	Density/Bulk (pounds/gallon)	8.53	Acceptable	50675102