

ADAMS TECHNOLOGY SYSTEMS

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ATSSC STANDARD OPERATING PROCEDURE

SOP for:	FIFRA 25(b) EXEMPTION	REV# 03	SOP# 50
SOP Written/Revised by:	Rob R. Adams, Jr	Rev. Date:	06/17/06

I. PURPOSE

Adams Technology State Pesticide Registration Service Center (ATSSC) must keep up with the EPA FIFRA § 25(b) requirements and the manner in which the states handle these Federally exempted products. This SOP details the requirements and source documentation for the EPA exemption. The State information is as per a periodic survey of each State Pesticide Office.

II. RESPONSIBILITY

Primary: Senior Registration Specialists
Secondary: ATSSC Service Center Manager

III. PROCEDURE

1. FIFRA § 25(b) provides for the exemption of certain pesticides from EPA registration if:
 - a. The Active Ingredient (AI) is on the EPA Exempt list. This list will not be updated. If your AI is not on this list then your product will not be exempt from registration under FIFRA § 25(b). Active Ingredients on the EPA Exempt List may not be used as an Inert Ingredient. **See Appendix A.**
 - b. ALL Inert Ingredients must be on the EPA Inerts List 4A. This List is updated on a continuing basis. Inert Ingredients on the EPA Inerts List 4A may not be used as an Active Ingredient. **See Appendix B.**
 - c. Product Label is formatted as per EPA PR Notice 2000-6. Important: While the EPA formatting is relatively simple, most states have additional requirements.
 - d. Even if EPA exempt, most states (currently 38) still require registration as a pesticide. See current ATS State FIFRA § 25(b) Exempt Pesticides Survey.
2. **EPA PR Notice 2000-6:** Explains, in plain English, how to comply with the Exemption. Released May 7, 2000, this document will not be updated.
PRN2000-6: http://www.epa.gov/PR_Notices/pr2000-6.pdf
3. The PR Notice details certain label formatting requirements. ATSSC has found that state regulations mandate additional requirements. The easiest way to ensure compliance is to:
 - a. Format FIFRA 25(b) Exempt labels to be essentially the same as an EPA registered pesticide. Then,
 - b. Modify the label draft as per EPA PR Notice 2000-6.
 - c. Submit a pdf file of the label artwork to a Senior Registration Specialist for a formal label review.
4. **EPA Inerts List 4A, "Minimal Risk Inerts" (See Appendix B)** is updated on a continuing basis. Current versions are available on the EPA Pesticides Web site.
List 4A by Name: http://www.epa.gov/opprd001/inerts/inerts_list4Aname.pdf
List 4A by CAS#: http://www.epa.gov/opprd001/inerts/inerts_list4Acas.pdf

5. **Source for EPA Authority:** Federal Register March 6, 1996 (Volume 61, Number 45) [Rules and Regulations] [Page 8876-8879] EPA amended 40 CFR Part 152 for the:
“Exemption of Certain Pesticide Substances From Federal Insecticide, Fungicide, and Rodenticide Act Requirements”
6. California has Exempted some products from state registration. While the exemption is similar to the EPA’s FIFRA 25(b), there are some differences that should be taken into consideration. Refer to California Code of Regulations (CCR) section 6147 - Exempted Pesticide Products.
7. Following this SOP are the reference documents mentioned above:
 - a. **EPA PR Notice 2000-6** - Minimum Risk Pesticides Exempted under FIFRA Section 25(b) Clarification of Issues
 - b. **Active Ingredients** Which May Be in Minimum Risk Pesticide Products Exempted under section 25(b) of FIFRA.
 - c. **Inerts List 4A** - Inert Ingredients Ordered Alphabetically by Chemical Name
 - d. **Inerts List 4A** - Inert Ingredients Ordered by CAS Number
 - e. **State Pesticide Survey** - Adams Technology Systems State FIFRA § 25(b) Exempt Pesticide Survey
 - f. **California Code** of Regulations (CCR) section 6147 - Exempted Pesticide Products

This Adams Technology Systems Standard Operating Procedure (SOP) and its attachments are for ATS State Pesticide Service Center internal use. It is being shared with the State Pesticide Offices, the Pesticide Industry and potential FIFRA 25(b) registrants. While all information is correct at the time of publication, we have given web site links so the documentation may be updated as needed.

PESTICIDE REGISTRATION (PR) NOTICE 2000-6

NOTICE TO MANUFACTURERS, FORMULATORS, PRODUCERS AND REGISTRANTS OF PESTICIDE PRODUCTS

ATTENTION: Persons Responsible for Registration of Pesticide Products

SUBJECT: Minimum Risk Pesticides Exempted under FIFRA Section 25(b)
Clarification of Issues

I. PURPOSE

This notice clarifies several aspects of the exemption for minimum risk pesticides by the FIFRA Section 25(b) rule, including composition, labeling, food tolerances, and state regulation. It is being issued to answer questions frequently asked of EPA about such products.

II. BACKGROUND

Section 2(u) of FIFRA defines a “pesticide” as “(1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant, and (3) any nitrogen stabilizer.” Except in very limited circumstances, any substance falling within this definition of a pesticide must be registered by EPA before it can be legally sold or distributed. One such exception to the registration requirement is for those pesticides that the Administrator, under section 25(b) of FIFRA, has determined “to be of a character which is unnecessary to be subject to this Act,” and that have been exempted from the requirements of FIFRA by regulation.

In 1996, EPA exempted certain minimum risk pesticides from FIFRA requirements if they satisfy certain conditions. EPA exempted the products described in 40 CFR section 152.25(g) in part to reduce the cost and regulatory burdens on businesses as well as the public for pesticides posing little or no risk, and to focus EPA’s limited resources on pesticides which pose greater risk to humans and the environment. This exemption provision is located in section 152.25(g) of Title 40 of the Code of Federal Regulations.

To qualify for an exemption as a minimum risk pesticide, each active ingredient in the pesticide product must be listed in 40 CFR 152.25(g)(1). Appendix A is a list of these ingredients. Currently, this list contains more than 30 active ingredients. In addition, 40 CFR 152.25(g)(2) provides that these pesticide products may only contain minimal risk inert ingredients listed in the most current List 4A. Appendix B is the most current list of these inert ingredients. Additionally, to be exempted and remain exempted, products must also meet a series of exemption conditions described in 40 CFR 152.25(g)(3).

EPA does not review or issue notices of exemption for products which meet the conditions for exemption. Sale or distribution of a pesticide product meeting all the criteria in 40 CFR 152.25(g) without a federal registration is not a violation of FIFRA. However, if a product does not meet all of the exemption criteria, the product is not exempt from FIFRA and its sale or distribution if not registered would be a violation of FIFRA.

How to Determine if a Product Qualifies for Exemption as a Minimum Risk Pesticide Under 40 CFR 152.25(g).

QUESTION: How can I tell if my product qualifies for the minimum risk pesticide exemption?

ANSWER: To qualify as a minimum risk pesticide under 40 CFR 152.25(g) (and be exempt from pesticide registration), a product must meet certain conditions. These conditions fall into the following two categories.

1. Composition:

- active ingredients: may contain only those active ingredients that are listed in 40 CFR 152.25(g)(1) and shown in Appendix A.
- other (inert) ingredients: may contain only List 4A inerts, including commonly consumed foods. (See Appendix B).

2. Labeling:

- All ingredients in an exempted product must be listed on its label:
 - Active ingredients must be listed by name and percentage (by weight).
 - All other ingredients must be listed by name (see above for inerts).
- No false or misleading statements under 40 CFR 156.10 (a)(5)(i)-(viii) may appear on an exempted product's label.
- Labeled Uses:

The product may not bear any claims to control or mitigate microorganisms in a way that links the microorganism to a threat to human health (including but not limited to disease transmitting bacteria or viruses) or claims to control rodent or insect pests in a way that links the pest to *specific* diseases (for example, the label may not say "controls ticks that carry Lyme disease" or "controls mosquitoes that can transmit malaria or encephalitis," but can say "controls ticks," or, "controls mosquitoes," etc.).

It is important to note that even if a pesticide product meets the conditions for exemption from regulation under FIFRA, it is still subject to any applicable requirements of the Federal Food, Drug, and Cosmetic Act (FFDCA) if its use results in pesticide chemical residues on or in food commodities or animal feed. In addition, producers of pesticides must meet any applicable state registration or other regulatory requirements. Each state has its own statutes and regulations concerning pesticide registration and regulation, and the states are not required to permit the sale of an exempted product simply because it meets the 40 CFR 152.25(g) conditions for minimum risk exemption. An address and telephone list of the state agencies which regulate pesticides may be found at:

<http://aapco.ceris.purdue.edu> and at

<http://www.epa.gov/pesticides/biopesticides/otherdocs/statelist.htm>. You may also call (703) 305-7973 to obtain a paper copy.

III. COMPOSITION OF "MINIMUM RISK PESTICIDES"

1. Active Ingredients

QUESTION: What active ingredients may be used in an exempted pesticide product?

ANSWER: Only active ingredients listed in 40 CFR 152.25(g)(1) may be in exempt products. Appendix A to this PR Notice lists all of the active ingredients which are currently permissible ingredients in exempt products.

QUESTION: Can other active ingredients be added to this list? How?

ANSWER: The Agency may modify this list in the future, but any additions (or deletions) would have to be accomplished through rule making. Companies cannot obtain an exemption on an ad hoc basis as part of the application process. EPA cannot exempt an ingredient or product as part of the application process without having completed the required rule making.

2. Other Ingredients

QUESTION: What other ingredients may be used in exempted products?

ANSWER: The only other ingredients an exempt product may contain are listed in the most current List 4A inert ingredients, which the Agency last published in the *Federal Register* of September 28, 1994. List 4A inert ingredients are considered to be minimal risk inert ingredients, and are recognized as safe for use in pesticide products. The current List 4A minimal risk inerts are listed in Appendix B to this PR Notice.

QUESTION: Can common foods be used as inert ingredients in exempted products?

ANSWER: Yes. EPA's policy is that "commonly consumed foods" are considered List 4A inert ingredients of minimal concern, even if they are not already included on the list of minimal risk inert ingredients. (See 59 FR 49400, September 28, 1994) "Inert Ingredients in Pesticide Products; List of Minimal Risk Inert Ingredients."

QUESTION: Will additions to the List 4A be possible?

ANSWER: Yes. Additions to List 4A are being considered by the Agency. Any changes will be published in the *Federal Register*.

QUESTION: If a List 4A minimal risk inert has active, pesticidal properties, am I allowed to use it as the active ingredient in an exempt product?

ANSWER: No. The two lists are not interchangeable. In other words, you may not use a List 4A inert ingredient as an active ingredient, and you also may not use one of the active ingredients listed in 40 CFR part 152.25(g)(1) as an inert. Only if the ingredient is included on both lists can it be used without regard to its active or inert function. Even then, the ingredient must be designated on the label as either active or inert (See Labeling below).

IV. LABELING OF MINIMUM RISK PESTICIDES

QUESTION: What should I include on my product's label?

ANSWER: In order to qualify for the minimum risk pesticide exemption, the pesticide product must meet certain labeling conditions. These conditions, all of which must be met in order to qualify for exemption, are as follows:

1. The pesticide product containing permissible substances must bear a label identifying the name and percentage (by weight) of each active ingredient and the name of each inert ingredient;
2. The product may not bear any claims to control or mitigate microorganisms in a way that links the microorganisms to a threat to human health (including but not limited to disease transmitting bacteria or viruses) or claims to control rodent or insect pests in a way that links the pest to *specific* diseases (for example, the label may not say "controls ticks that carry Lyme disease" or "controls mosquitoes that can transmit malaria or encephalitis," but can say "controls ticks," or, "controls mosquitoes," etc.);

and

3. The product must not include any false or misleading labeling statements prohibited by 40 CFR 156.10 (a)(5) (i)-(viii). To follow is a list of unacceptable types of statements that Agency regulations provide are false or misleading, along with some examples:

- a. A false or misleading statement concerning the composition of the product;
- b. A false or misleading statement concerning the effectiveness of the product as a pesticide or device;
- c. A false or misleading statement about the value of the product for purposes other than as a pesticide or device;
- d. A false or misleading comparison with other pesticides or devices;
- e. Any statement directly or indirectly implying that the pesticide or device is recommended or endorsed by any agency of the Federal Government;

Example: “Recommended by EPA as safe and exempt.” This kind of statement leads the consumer to believe that the Federal Government has made such a determination for a particular product. Because exempted products are not reviewed by EPA, this kind of statement is misleading.

Example: “It is a Violation of Federal Law to Use this Product in a Manner Inconsistent with its Labeling.”

Example: “EPA Registration No.” or “EPA Establishment No.”

The latter two examples are false or misleading because they imply that the product is registered by EPA.

Example: An example of a statement that the Agency would likely consider acceptable would be: “This product has not been registered by the United States Environmental Protection Agency. [The name of the company] represents that this product qualifies for exemption from registration under the Federal Insecticide, Fungicide, and Rodenticide Act.”

- f. The name of a pesticide which contains two or more principal active ingredients if the name suggests one or more, but not all such principal active ingredients, even though the names of the other ingredients are stated elsewhere in the labeling;
- g. A true statement used in such a way as to give a false or misleading impression to the purchaser;
- h. Label disclaimers which negate or detract from labeling statements required under the act and these regulations, including as conditions of exemption.

QUESTION: I have found mosquito and tick repellents on the market shelf that do not have EPA registration numbers. I thought that exempted pesticide products could not be labeled to control these kinds of pests?

ANSWER: Claims that the exempted pesticide controls these kinds of *pests* are allowed, but no claims may be made to make the consumer believe that they would be protected by using the product from a *disease* that these insects can carry, such as Lyme disease. ***Remember: the claim may only be for the pest, as a pest, and not as a disease vector.***

Example of an appropriate claim: “repels mosquitoes and ticks.”

Examples of an inappropriate claim: “repels mosquitoes that can transmit malaria,”or, “Will repel ticks that cause Lyme disease.”

QUESTION: I have seen products that say they are "the natural way to control pests," or "safe for kids and pets." Aren't these considered by EPA to be false and misleading claims?

ANSWER: No, not for exempted minimum risk pesticides. Products that meet the criteria for exemption from regulation may make safety claims if true. On the other hand, claims cannot be worded in such a way that implies or states endorsement by EPA or another federal agency or department.

V. FOOD TOLERANCES FOR "MINIMUM RISK PESTICIDES"

QUESTION: What are the requirements if my product is to be used on or around food, food crops, food contact surfaces, or animal feed?

ANSWER: Even if a product is exempt under FIFRA, it must have a tolerance or tolerance exemption under FFDCA, if the product is to be used on food, food crops, food contact

surfaces, or animal feed commodities.

The minimum risk pesticide exemption, 40 CFR 152.25(g), only exempts qualifying pesticide products from certain requirements of FIFRA. The use of pesticides on food, food crops, food contact surfaces, and animal feed can result in residues of pesticide products on or in treated foods or foods which come into contact with treated surfaces. Tolerances are maximum legally permissible levels of pesticide residues, including active and inert ingredients, which may be found in foods. In some instances, pesticides are exempted from the requirement of a tolerance, because the pesticide is considered to be safe enough for use at any level. Tolerances and exemptions from tolerance are established and regulated by the EPA under the Federal Food, Drug and Cosmetic Act (FFDCA), not FIFRA. The pesticide label may bear only those food uses for which there are tolerances or exemptions from tolerances for the active and inert ingredients. If the tolerance exemption is for all food commodities, then any food crops, food surfaces, or animal feed can be listed on the label.

QUESTION: How can I find out if my active and inert ingredients have tolerances or are exempt from the requirement of a tolerance?

ANSWER: Tolerances and exemptions for foods are listed in Parts 180, 185, and 186 of Title 40 of the Code of Federal Regulations for each active ingredient and inert ingredient. Appendices A and B can be used to identify which actives and inerts are exempt from tolerances on all crops as of the date of this notice. In addition, tolerances and exemptions are published throughout the year in the Federal Register. This source is frequently more up-to-date than the latest version of 40 CFR and thus, needs to be checked to verify that no changes have occurred since the last printing of the 40 CFR.

QUESTION: How do I get a tolerance if I need one?

ANSWER: The first step to receive a tolerance is to petition the Agency by following the guidelines found in 40 CFR section 180.7 (see www.gpo.gov). Additional guidance can be found at www.epa.gov/PesticideApplication. The Agency will then announce the receipt of the petition in the Federal register. Tolerance fees are required, but may be waived on a case-by-case basis.

VI. STATE REGULATION OF "MINIMUM RISK PESTICIDE" PRODUCTS

QUESTION: What must I do to meet any applicable state registration requirements?

ANSWER: Even if a pesticide product is exempt from FIFRA requirements, the product may not be exempt from state registration or other regulatory requirements. Each state has its own statutes and regulations concerning pesticide registration and regulation. A pesticide product

exempted from federal regulation is not automatically exempt in a state. It is important that you contact the state agencies responsible for pesticide regulation in those states in which you would like to sell your product, so you can find out what you need to do in order to satisfy their requirements for pesticide registration if required. An address and telephone list of the state agencies which regulate pesticides is available online <http://www.epa.gov/pesticides/biopesticides/otherdocs/statelist.htm>. You may also call (703) 305-7973 to obtain a paper copy.

QUESTION: What happens if a state won't accept my product as an exempted pesticide?

ANSWER: You may:

1. Comply with the State's requirements in order to sell and distribute the product; or
2. Not sell or distribute the product in that state; or
3. You may register the product with the EPA if EPA determines that your product meets all the health and safety standards and all other applicable requirements. You must also meet any applicable State requirements for your product.

If a pesticide product does not meet the conditions for minimum risk pesticide exemption, or if states will not accept the product without an EPA registration, a registration kit may be obtained by calling 703-305-6549. The kit is also available on our website, at www.epa.gov/pesticides/registrationkit.

Please note that the sale or distribution of a pesticide without an EPA registration that does not meet the conditions for a minimum risk pesticide and does not fall within any other exemption from FIFRA is a violation of FIFRA. (See, e.g., FIFRA section 12(a)(1).)

VII. FOR FURTHER INFORMATION

If you have any further questions, please contact Brian Steinwand at (703) 305-7973 (e-mail: steinwand.brian@epa.gov).

Marcia E. Mulkey, Director
Office of Pesticide Programs

Appendix A
PR Notice 2000-6

Active Ingredients Which May Be in Minimum Risk Pesticide Products Exempted under section 25(b) of FIFRA

1. Castor Oil (U.S.P. or equivalent)
2. Cedar Oil
3. Cinnamon* and Cinnamon Oil *
4. Citric Acid*
5. Citronella and Citronella Oil
6. Cloves* and Clove Oil*
7. Corn Gluten Meal*
8. Corn Oil*
9. Cottonseed Oil*
10. Dried Blood
11. Eugenol
12. Garlic* and Garlic Oil*
13. Geraniol
14. Geranium Oil
15. Lauryl Sulfate
16. Lemon grass Oil*
17. Linseed Oil
18. Malic Acid*
19. Mint* and Mint Oil*
20. Peppermint* and Peppermint Oil*
21. 2-Phenethyl Propionate (2-phenylethyl propionate)
22. Potassium Sorbate
23. Putrescent Whole Egg Solids (See 180.1071)
24. Rosemary * and Rosemary Oil*
25. Sesame* (includes ground Sesame plant stalks) (See 180.1087) and Sesame Oil*
26. Sodium Chloride (common salt)*
27. Sodium Lauryl Sulfate
28. Soybean Oil
29. Thyme* and Thyme Oil*
30. White Pepper*
31. Zinc Metal Strips (consisting solely of zinc metal and impurities)

* These active ingredients are exempt for use on all food commodities from the requirement of a tolerance on all raw agricultural commodities at 40 CFR 180.1164(d).

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

CAS	PREFIX NAME	List No.
62-54-4	Acetic acid, calcium salt	4A
127-08-2	Acetic acid, potassium salt	4A
127-09-3	Acetic acid, sodium salt	4A
8007-69-0	Almond oil	4A
1327-43-1	Aluminum magnesium silicate	4A
1327-44-2	Aluminum potassium silicate	4A
	Animal feed items conforming to 40 CFR 180.950(b)	4A
	Animal glue	4A
50-81-7	L- Ascorbic acid	4A
137-66-6	Ascorbyl palmitate	4A
8012-89-3	Beeswax	4A
1302-78-9	Bentonite	4A
85409-30-5	Bentonite, sodian	4A
1863-63-4	Benzoic acid, ammonium salt	4A
2090-05-3	Benzoic acid, calcium salt	4A
553-70-8	Benzoic acid, magnesium salt	4A
582-25-2	Benzoic acid, potassium salt	4A
532-32-1	Benzoic acid, sodium salt	4A
68409-75-6	Bone meal	4A
123-95-5	Butyl stearate	4A
5743-26-0	Calcium acetate, monohydrate	4A
471-34-1	Calcium carbonate	4A
6107-56-8	Calcium octanoate	4A
12168-85-3	Calcium oxide silicate (Ca ₃ O(SiO ₄))	4A
10101-41-4	Calcium sulfate, dihydrate	4A
10034-76-1	Calcium sulfate, hemihydrate	4A
68476-78-8	Cane syrup	4A
120962-03-0	Canola oil	4A
7440-44-0	Carbon	4A
124-38-9	Carbon dioxide	4A
13397-26-7	Carbonic acid, calcium salt (calcite)	4A
546-93-0	Carbonic acid, magnesium salt (1:1)	4A
298-14-6	Carbonic acid, monopotassium salt	4A
144-55-8	Carbonic acid, monosodium salt	4A
	Cardboard	4A
8015-86-9	Carnauba wax	4A
9000-40-2	Carob gum (locust bean gum)	4A
9000-07-1	Carrageenan	4A
8001-79-4	Castor oil	4A
8001-78-3	Castor oil, hydrogenated	4A
	Cat food	4A
9004-34-6	Cellulose	4A
9004-35-7	Cellulose acetate	4A
9004-32-4	Cellulose carboxy methyl ether, sodium salt	4A
9004-62-0	Cellulose, 2-hydroxyethyl ether	4A
9004-64-2	Cellulose, 2-hydroxypropyl ether	4A
9004-65-3	Cellulose, 2-hydroxypropyl methyl ester	4A
9000-11-7	Cellulose, carboxymethyl ether	4A
9004-67-5	Cellulose, methyl ether	4A

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

51395-75-6	Cellulose, mixture with cellulose carboxymethyl ether, sodium salt	4A
65996-61-4	Cellulose, pulp	4A
68442-85-3	Cellulose, regenerated	4A
77-92-9	Citric acid	4A
813-94-5	Citric acid, calcium salt (2:3)	4A
7693-13-2	Citric acid, calcium salt (2:3)	4A
3609-96-9	Citric acid, dipotassium salt	4A
144-33-2	Citric acid, disodium salt	4A
5949-29-1	Citric acid, monohydrate	4A
866-83-1	Citric acid, monopotassium salt	4A
18996-35-5	Citric acid, monosodium salt	4A
7778-49-6	Citric acid, potassium salt	4A
994-36-5	Citric acid, sodium salt	4A
866-84-2	Citric acid, tripotassium salt	4A
6100-05-6	Citric acid, tripotassium salt, monohydrate	4A
68-04-2	Citric acid, trisodium salt	4A
6132-04-3	Citric acid, trisodium salt, dihydrate	4A
6858-44-2	Citric acid, trisodium salt, pentahydrate	4A
68514-76-1	Citrus pulp, orange	4A
	Clam shells	4A
8002-31-1	Cocoa	4A
8001-31-8	Coconut oil	4A
68916-18-7	Coffee grounds	4A
	Commonly consumed food commodities conforming to 40 CFR 180.950(a)	4A
61789-98-8	Cork	4A
68525-86-0	Corn flour	4A
8001-30-7	Corn oil	4A
8029-43-4	Corn syrup	4A
68131-37-3	Corn syrup solids	4A
9005-25-8	Cornstarch	4A
	Cotton	4A
68424-10-2	Cottonseed meal	4A
8001-29-4	Cottonseed oil	4A
53988-07-1	Decanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
26402-22-2	Decanoic acid, monoester with 1,2,3-propanetriol	4A
9004-53-9	Dextrins	4A
50-99-7	Dextrose	4A
61790-53-2	Diatomaceous earth (less than 1% crystalline silica)	4A
143-07-7	Dodecanoic acid	4A
142-18-7	Dodecanoic acid, 2,3-dihydroxypropyl ester	4A
27638-00-2	Dodecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
27215-38-9	Dodecanoic acid, monoester with 1,2,3-propanetriol (9CI)	4A
16389-88-1	Dolomite (CaMg(CO ₃) ₂)	4A
	Douglas fir bark	4A
	Edible fats and oils conforming to 40 CFR 180.950(c)	4A
	Egg shells	4A
68476-25-5	Feldspar group minerals	4A
8016-13-5	Fish oil	4A
8031-18-3	Fuller's earth	4A
110-17-8	Fumaric acid	4A

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

71010-52-1	Gellan gum (tolerance pending approval)	4A
68476-37-9	Glue (as depolymerized animal collagen)	4A
56-81-5	Glycerol (glycerin) 1,2,3 propanetriol	4A
7782-42-5	Graphite	4A
9000-30-0	Guar gum	4A
13397-24-5	Gypsum	4A
1317-60-8	Hematite (Fe ₂ O ₃)	4A
57-10-3	Hexadecanoic acid	4A
26657-95-4	Hexadecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
26657-96-5	Hexadecanoic acid, monoester with 1,2,3-propanetriol	4A
8028-66-8	Honey	4A
68514-28-3	Humic acid, potassium salt	4A
68131-04-4	Humic acid, sodium salt	4A
68334-00-9	Hydrogenated cottonseed oil	4A
68514-74-9	Hydrogenated palm oils	4A
84681-71-0	Hydrogenated rapeseed oil	4A
8016-70-4	Hydrogenated soybean oil	4A
8013-17-0	Invert sugar	4A
12068-86-9	Iron magnesium oxide (Fe ₂ MgO ₄)	4A
1317-61-9	Iron oxide (Fe ₃ O ₄)	4A
1309-37-1	Iron oxide (Fe ₂ O ₃)	4A
12259-21-1	Iron oxide (Fe ₂ O ₃), hydrate	4A
1345-25-1	Iron oxide (FeO)	4A
110-27-0	Isopropyl myristate	4A
1332-58-7	Kaolin	4A
97-64-3	Lactic acid, ethyl ester	4A
138-22-7	Lactic acid, n-butyl ester	4A
	D-	
63-42-3	(+)- Lactose	4A
64044-51-5	Lactose, monohydrate	4A
8006-54-0	Lanolin	4A
61789-99-9	Lard	4A
8002-43-5	Lecithins	4A
8030-76-0	Lecithins, soya	4A
68916-91-6	Licorice extract	4A
12001-27-3	Lime (chemical) dolomitic	4A
1317-65-3	Limestone	4A
8001-26-1	Linseed oil (unboiled)	4A
1309-48-4	Magnesium oxide	4A
12207-97-5	Magnesium oxide silicate (Mg ₃ O(Si ₂ O ₅) ₂), monohydrate	4A
1343-90-4	Magnesium silicate, hydrate	4A
14987-04-3	Magnesium silicon oxide (Mg ₂ Si ₃ O ₈)	4A
10034-99-8	Magnesium sulfate heptahydrate	4A
6915-15-7	Malic acid	4A
8002-48-0	Malt extract	4A
9050-36-6	Maltodextrin	4A
68131-12-4	Meat meal	4A
12003-38-2	Mica	4A
12001-26-2	Mica group minerals	4A
8052-35-5	Molasses	4A
1318-93-0	Montmorillonite	4A

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

1327-36-2	Mullite	4A
37244-96-5	Nepheline syenite	4A
7727-37-9	Nitrogen	4A
134134-87-5	Oat protein	4A
25496-72-4	9- Octadecanoic acid (9Z)-,monoester with 1,2,3 propanetriol	4A
1002-89-7	Octadecanoic acid, ammonium salt	4A
1592-23-0	Octadecanoic acid, calcium salt	4A
557-04-0	Octadecanoic acid, magnesium salt	4A
12694-22-3	9- Octadecanoic acid, monoester with oxybis (propanediol)	4A
593-29-3	Octadecanoic acid, potassium salt	4A
822-16-2	Octadecanoic acid, sodium salt	4A
557-05-1	Octadecanoic acid, zinc salt	4A
111-03-5	9- Octadecenoic acid (Z)-, 2,3-dihydroxypropyl ester (9CI)	4A
143-18-0	9- Octadecenoic acid (9Z)-, potassium salt	4A
143-19-1	9- Octadecenoic acid (9Z)-, sodium salt	4A
7492-30-0	9- Octadecenoic acid, 12-hydroxy-, monopotassium salt, (9Z,	4A
5323-95-5	9- Octadecenoic acid, 12-hydroxy-, monosodium salt, (9Z, 12R)	4A
49553-76-6	9- Octadecenoic acid, ester with 1,2,3-propanetriol	4A
71012-10-7	9- Octadecenoic acid, monoester with tetraglycerol	4A
	Octanoic acid, diester iwht 1,2,3-propanetriol	
36354-80-0	(9CI)	4A
26402-26-6	Octanoic acid, monoester with 1,2,3-propanetriol	4A
1984-06-1	Octanoic acid, sodium salt	4A
1323-83-7	Octodecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
11099-07-3	Octodecanoic acid, ester with 1,2,3-propanetriol (9CI)	4A
	Octodecanoic acid, monoester with 1,2,3-propanetriol	
31566-31-1	(9CI)	4A
25637-84-7	9- Octodecenoic acid (9Z)-, diester with 1,2,3-propanetriol (9C	4A
68917-73-7	Oils, wheat	4A
112-80-1	Oleic acid	4A
8001-25-0	Olive oil	4A
	Oyster shells	4A
8002-75-3	Palm oil	4A
	Paper	4A
68991-42-4	Paprika	4A
8002-74-2	Paraffin wax	4A
8002-03-7	Peanut oil	4A
	Peat moss	4A
130885-09-5	Perlite	4A
93763-70-3	Perlite, expanded	4A
26499-65-0	Plaster of Paris	4A
9002-88-4	Polyethylene	4A
7646-93-7	Potassium bisulfate	4A
7447-40-7	Potassium chloride	4A
764-71-6	Potassium octoate	4A
24634-61-5	Potassium sorbate	4A
9007-48-1	1,2,3- Propanetriol, homopolymer (9Z)-9-octadecenoate	4A
9009-32-9	1,2,3- Propanetriol, homopolymer, octadecanoate	4A
1332-09-8	Pumice	4A
68553-81-1	Rice bran oil	4A
9006-04-6	Rubber	4A

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

8001-23-8	Safflower oil	4A
	Sawdust	4A
8008-74-0	Sesame seed oil	4A
63231-67-4	Silica Gel	4A
112926-00-8	Silica gel, precipitated, crystalline-free	4A
112945-52-5	Silica, amorphous, fumed (crystalline free)	4A
7699-41-4	Silica, amorphous, precipitated and gel	4A
10279-57-9	Silica, hydrate	4A
60676-86-0	Silica, vitreous	4A
13776-74-4	Silicic acid (H ₂ SiO ₃), magnesium salt (1:1)	4A
12003-51-9	Silicic acid (H ₄ SiO ₄), aluminum sodium salt (1:1:1)	4A
12736-96-8	Silicic acid, aluminum potassium sodium salt	4A
1335-30-4	Silicic acid, aluminum salt	4A
1344-00-9	Silicic acid, aluminum sodium salt	4A
1344-95-2	Silicic acid, calcium salt	4A
1343-88-0	Silicic acid, magnesium salt	4A
7631-86-9	Silicon dioxide (crystalline-free forms only)	4A
1393-03-9	Soapbark (Quillaja saponin)	4A
9005-38-3	Sodium alginate	4A
7647-14-5	Sodium chloride	4A
50-70-4	Sorbitol	4A
8001-22-7	Soybean oil	4A
8002-24-2	Sperm oil	4A
57-11-4	Stearic acid	4A
57-50-1	Sugar	4A
7704-34-9	Sulfur	4A
7778-18-9	Sulfuric acid, calcium salt (1:1)	4A
7778-80-5	Sulfuric acid, dipotassium salt	4A
7757-82-6	Sulfuric acid, disodium salt	4A
7727-73-3	Sulfuric acid, disodium salt, decahydrate	4A
7487-88-9	Sulfuric acid, magnesium salt (1:1)	4A
68937-99-5	Sunflower seeds	4A
61789-97-7	Tallow	4A
544-63-8	Tetradecanoic acid	4A
589-68-4	Tetradecanoic acid, 2,3-dihydroxypropyl ester	4A
53563-63-6	Tetradecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
27214-38-6	Tetradecanoic acid, monoester with 1,2,3-propanetriol (9CI)	4A
13429-27-1	Tetradecanoic acid, potassium salt	4A
57-13-6	Urea	4A
121-33-5	Vanillin	4A
1318-00-9	Vermiculite	4A
	Vinegar (maximum of 8% acetic acid in solution)	4A
1406-18-4	Vitamin E	4A
7732-18-5	Water	4A
8006-95-9	Wheat germ oil	4A
8042-47-5	White mineral oil (petroleum)	4A
68917-75-9	Wintergreen oil	4A
13983-17-0	Wollastonite (Ca(SiO ₃))	4A
11138-66-2	Xanthan gum	4A
68876-77-7	Yeast	4A

Inert Ingredients Ordered Alphabetically by Chemical Name - List 4A Updated August 2004

1318-02-1	Zeolites (excluding erionite (CAS Reg. No. 66733-21-9))	4A
68989-22-0	Zeolites, NaA	4A
12063-19-3	Zinc iron oxide	4A
1314-13-2	Zinc oxide	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

CAS	PREFIX NAME	
50-70-4	Sorbitol	4A
50-81-7	L- Ascorbic acid	4A
50-99-7	Dextrose	4A
56-81-5	Glycerol (glycerin) 1,2,3 propanetriol	4A
57-10-3	Hexadecanoic acid	4A
57-11-4	Stearic acid	4A
57-13-6	Urea	4A
57-50-1	Sugar	4A
62-54-4	Acetic acid, calcium salt	4A
	D-	
63-42-3	(+)- Lactose	4A
68-04-2	Citric acid, trisodium salt	4A
77-92-9	Citric acid	4A
97-64-3	Lactic acid, ethyl ester	4A
110-17-8	Fumaric acid	4A
110-27-0	Isopropyl myristate	4A
111-03-5	9- Octadecenoic acid (Z)-, 2,3-dihydroxypropyl ester (9CI)	4A
112-80-1	Oleic acid	4A
121-33-5	Vanillin	4A
123-95-5	Butyl stearate	4A
124-38-9	Carbon dioxide	4A
127-08-2	Acetic acid, potassium salt	4A
127-09-3	Acetic acid, sodium salt	4A
137-66-6	Ascorbyl palmitate	4A
138-22-7	Lactic acid, n-butyl ester	4A
142-18-7	Dodecanoic acid, 2,3-dihydroxypropyl ester	4A
143-07-7	Dodecanoic acid	4A
143-18-0	9- Octadecenoic acid (9Z)-, potassium salt	4A
143-19-1	9- Octadecenoic acid (9Z)-, sodium salt	4A
144-33-2	Citric acid, disodium salt	4A
144-55-8	Carbonic acid, monosodium salt	4A
298-14-6	Carbonic acid, monopotassium salt	4A
471-34-1	Calcium carbonate	4A
532-32-1	Benzoic acid, sodium salt	4A
544-63-8	Tetradecanoic acid	4A
546-93-0	Carbonic acid, magnesium salt (1:1)	4A
553-70-8	Benzoic acid, magnesium salt	4A
557-04-0	Octadecanoic acid, magnesium salt	4A
557-05-1	Octadecanoic acid, zinc salt	4A
582-25-2	Benzoic acid, potassium salt	4A
589-68-4	Tetradecanoic acid, 2,3-dihydroxypropyl ester	4A
593-29-3	Octadecanoic acid, potassium salt	4A
764-71-6	Potassium octoate	4A
813-94-5	Citric acid, calcium salt (2:3)	4A
822-16-2	Octadecanoic acid, sodium salt	4A
866-83-1	Citric acid, monopotassium salt	4A
866-84-2	Citric acid, tripotassium salt	4A
994-36-5	Citric acid, sodium salt	4A
1002-89-7	Octadecanoic acid, ammonium salt	4A
1302-78-9	Bentonite	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

1309-37-1	Iron oxide (Fe ₂ O ₃)	4A
1309-48-4	Magnesium oxide	4A
1314-13-2	Zinc oxide	4A
1317-60-8	Hematite (Fe ₂ O ₃)	4A
1317-61-9	Iron oxide (Fe ₃ O ₄)	4A
1317-65-3	Limestone	4A
1318-00-9	Vermiculite	4A
1318-02-1	Zeolites (excluding erionite (CAS Reg. No. 66733-21-9))	4A
1318-93-0	Montmorillonite	4A
1323-83-7	Octadecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
1327-36-2	Mullite	4A
1327-43-1	Aluminum magnesium silicate	4A
1327-44-2	Aluminum potassium silicate	4A
1332-09-8	Pumice	4A
1332-58-7	Kaolin	4A
1335-30-4	Silicic acid, aluminum salt	4A
1343-88-0	Silicic acid, magnesium salt	4A
1343-90-4	Magnesium silicate, hydrate	4A
1344-00-9	Silicic acid, aluminum sodium salt	4A
1344-95-2	Silicic acid, calcium salt	4A
1345-25-1	Iron oxide (FeO)	4A
1393-03-9	Soapbark (Quillaja saponin)	4A
1406-18-4	Vitamin E	4A
1592-23-0	Octadecanoic acid, calcium salt	4A
1863-63-4	Benzoic acid, ammonium salt	4A
1984-06-1	Octanoic acid, sodium salt	4A
2090-05-3	Benzoic acid, calcium salt	4A
3609-96-9	Citric acid, dipotassium salt	4A
5323-95-5	9- Octadecenoic acid, 12-hydroxy-, monosodium salt, (9Z, 12R)	4A
5743-26-0	Calcium acetate, monohydrate	4A
5949-29-1	Citric acid, monohydrate	4A
6100-05-6	Citric acid, tripotassium salt, monohydrate	4A
6107-56-8	Calcium octanoate	4A
6132-04-3	Citric acid, trisodium salt, dihydrate	4A
6858-44-2	Citric acid, trisodium salt, pentahydrate	4A
6915-15-7	Malic acid	4A
7440-44-0	Carbon	4A
7447-40-7	Potassium chloride	4A
7487-88-9	Sulfuric acid, magnesium salt (1:1)	4A
7492-30-0	9- Octadecenoic acid, 12-hydroxy-, monopotassium salt, (9Z,	4A
7631-86-9	Silicon dioxide (crystalline-free forms only)	4A
7646-93-7	Potassium bisulfate	4A
7647-14-5	Sodium chloride	4A
7693-13-2	Citric acid, calcium salt (2:3)	4A
7699-41-4	Silica, amorphous, precipitated and gel	4A
7704-34-9	Sulfur	4A
7727-37-9	Nitrogen	4A
7727-73-3	Sulfuric acid, disodium salt, decahydrate	4A
7732-18-5	Water	4A
7757-82-6	Sulfuric acid, disodium salt	4A
7778-18-9	Sulfuric acid, calcium salt (1:1)	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

7778-49-6	Citric acid, potassium salt	4A
7778-80-5	Sulfuric acid, dipotassium salt	4A
7782-42-5	Graphite	4A
8001-22-7	Soybean oil	4A
8001-23-8	Safflower oil	4A
8001-25-0	Olive oil	4A
8001-26-1	Linseed oil (unboiled)	4A
8001-29-4	Cottonseed oil	4A
8001-30-7	Corn oil	4A
8001-31-8	Coconut oil	4A
8001-78-3	Castor oil, hydrogenated	4A
8001-79-4	Castor oil	4A
8002-03-7	Peanut oil	4A
8002-24-2	Sperm oil	4A
8002-31-1	Cocoa	4A
8002-43-5	Lecithins	4A
8002-48-0	Malt extract	4A
8002-74-2	Paraffin wax	4A
8002-75-3	Palm oil	4A
8006-54-0	Lanolin	4A
8006-95-9	Wheat germ oil	4A
8007-69-0	Almond oil	4A
8008-74-0	Sesame seed oil	4A
8012-89-3	Beeswax	4A
8013-17-0	Invert sugar	4A
8015-86-9	Carnauba wax	4A
8016-13-5	Fish oil	4A
8016-70-4	Hydrogenated soybean oil	4A
8028-66-8	Honey	4A
8029-43-4	Corn syrup	4A
8030-76-0	Lecithins, soya	4A
8031-18-3	Fuller's earth	4A
8042-47-5	White mineral oil (petroleum)	4A
8052-35-5	Molasses	4A
9000-07-1	Carrageenan	4A
9000-11-7	Cellulose, carboxymethyl ether	4A
9000-30-0	Guar gum	4A
9000-40-2	Carob gum (locust bean gum)	4A
9002-88-4	Polyethylene	4A
9004-32-4	Cellulose carboxy methyl ether, sodium salt	4A
9004-34-6	Cellulose	4A
9004-35-7	Cellulose acetate	4A
9004-53-9	Dextrins	4A
9004-62-0	Cellulose, 2-hydroxyethyl ether	4A
9004-64-2	Cellulose, 2-hydroxypropyl ether	4A
9004-65-3	Cellulose, 2-hydroxypropyl methyl ester	4A
9004-67-5	Cellulose, methyl ether	4A
9005-25-8	Cornstarch	4A
9005-38-3	Sodium alginate	4A
9006-04-6	Rubber	4A
9007-48-1	1,2,3- Propanetriol, homopolymer (9Z)-9-octadecenoate	4A
9009-32-9	1,2,3- Propanetriol, homopolymer, octadecanoate	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

9050-36-6	Maltodextrin	4A
10034-76-1	Calcium sulfate, hemihydrate	4A
10034-99-8	Magnesium sulfate heptahydrate	4A
10101-41-4	Calcium sulfate, dihydrate	4A
10279-57-9	Silica, hydrate	4A
11099-07-3	Octadecanoic acid, ester with 1,2,3-propanetriol (9CI)	4A
11138-66-2	Xanthan gum	4A
12001-26-2	Mica group minerals	4A
12001-27-3	Lime (chemical) dolomitic	4A
12003-38-2	Mica	4A
12003-51-9	Silicic acid (H ₄ SiO ₄), aluminum sodium salt (1:1:1)	4A
12063-19-3	Zinc iron oxide	4A
12068-86-9	Iron magnesium oxide (Fe ₂ MgO ₄)	4A
12168-85-3	Calcium oxide silicate (Ca ₃ O(SiO ₄))	4A
12207-97-5	Magnesium oxide silicate (Mg ₃ O(Si ₂ O ₅) ₂), monohydrate	4A
12259-21-1	Iron oxide (Fe ₂ O ₃), hydrate	4A
12694-22-3	9- Octadecanoic acid, monoester with oxybis (propanediol)	4A
12736-96-8	Silicic acid, aluminum potassium sodium salt	4A
13397-24-5	Gypsum	4A
13397-26-7	Carbonic acid, calcium salt (calcite)	4A
13429-27-1	Tetradecanoic acid, potassium salt	4A
13776-74-4	Silicic acid (H ₂ SiO ₃), magnesium salt (1:1)	4A
13983-17-0	Wollastonite (Ca(SiO ₃))	4A
14987-04-3	Magnesium silicon oxide (Mg ₂ Si ₃ O ₈)	4A
16389-88-1	Dolomite (CaMg(CO ₃) ₂)	4A
18996-35-5	Citric acid, monosodium salt	4A
24634-61-5	Potassium sorbate	4A
25496-72-4	9- Octadecanoic acid (9Z)-, monoester with 1,2,3 propanetriol	4A
25637-84-7	9- Octadecanoic acid (9Z)-, diester with 1,2,3-propanetriol (9CI)	4A
26402-22-2	Decanoic acid, monoester with 1,2,3-propanetriol	4A
26402-26-6	Octanoic acid, monoester with 1,2,3-propanetriol	4A
26499-65-0	Plaster of Paris	4A
26657-95-4	Hexadecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
26657-96-5	Hexadecanoic acid, monoester with 1,2,3-propanetriol	4A
27214-38-6	Tetradecanoic acid, monoester with 1,2,3-propanetriol (9CI)	4A
27215-38-9	Dodecanoic acid, monoester with 1,2,3-propanetriol (9CI)	4A
27638-00-2	Dodecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
31566-31-1	Octadecanoic acid, monoester with 1,2,3-propanetriol (9CI)	4A
	Octanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
36354-80-0	Nepheline syenite	4A
37244-96-5	Nepheline syenite	4A
49553-76-6	9- Octadecanoic acid, ester with 1,2,3-propanetriol	4A
51395-75-6	Cellulose, mixture with cellulose carboxymethyl ether, sodium salt	4A
53563-63-6	Tetradecanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
53988-07-1	Decanoic acid, diester with 1,2,3-propanetriol (9CI)	4A
60676-86-0	Silica, vitreous	4A
61789-97-7	Tallow	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

61789-98-8	Cork	4A
61789-99-9	Lard	4A
61790-53-2	Diatomaceous earth (less than 1% crystalline silica)	4A
63231-67-4	Silica Gel	4A
64044-51-5	Lactose, monohydrate	4A
65996-61-4	Cellulose, pulp	4A
68131-04-4	Humic acid, sodium salt	4A
68131-12-4	Meat meal	4A
68131-37-3	Corn syrup solids	4A
68334-00-9	Hydrogenated cottonseed oil	4A
68409-75-6	Bone meal	4A
68424-10-2	Cottonseed meal	4A
68442-85-3	Cellulose, regenerated	4A
68476-25-5	Feldspar group minerals	4A
68476-37-9	Glue (as depolymerized animal collagen)	4A
68476-78-8	Cane syrup	4A
68514-28-3	Humic acid, potassium salt	4A
68514-74-9	Hydrogenated palm oils	4A
68514-76-1	Citrus pulp, orange	4A
68525-86-0	Corn flour	4A
68553-81-1	Rice bran oil	4A
68876-77-7	Yeast	4A
68916-18-7	Coffee grounds	4A
68916-91-6	Licorice extract	4A
68917-73-7	Oils, wheat	4A
68917-75-9	Wintergreen oil	4A
68937-99-5	Sunflower seeds	4A
68989-22-0	Zeolites, NaA	4A
68991-42-4	Paprika	4A
71010-52-1	Gellan gum (tolerance pending approval)	4A
71012-10-7	9- Octadecenoic acid, monoester with tetraglycerol	4A
84681-71-0	Hydrogenated rapeseed oil	4A
85409-30-5	Bentonite, sodian	4A
93763-70-3	Perlite, expanded	4A
112926-00-8	Silica gel, precipitated, crystalline-free	4A
112945-52-5	Silica, amorphous, fumed (crystalline free)	4A
120962-03-0	Canola oil	4A
130885-09-5	Perlite	4A
134134-87-5	Oat protein	4A
	Animal feed items conforming to 40 CFR 180.950(b)	4A
	Animal glue	4A
	Cardboard	4A
	Cat food	4A
	Clam shells	4A
	Commonly consumed food commodities conforming to 40 CFR 180.950(a)	4A
	Cotton	4A
	Douglas fir bark	4A
	Edible fats and oils conforming to 40 CFR 180.950(c)	4A
	Egg shells	4A
	Oyster shells	4A
	Paper	4A

Inert Ingredients Ordered by CAS Number - List 4A Updated August 2004

Peat moss	4A
Sawdust	4A
Vinegar (maximum of 8% acetic acid in solution)	4A

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ADAMS TECHNOLOGY STATE PESTICIDE REGISTRATION SERVICE CENTER (ATSSC)

State FIFRA § 25(b) EXEMPT PESTICIDES SURVEY

Updated: June 17, 2006

In the Federal Register: March 6, 1996 (Volume 61, Number 45) [Rules and Regulations] [Page 8876-8879] EPA amended 40 CFR Part 152 for the:
“Exemption of Certain Pesticide Substances From Federal Insecticide, Fungicide, and Rodenticide Act Requirements”

“SUMMARY: This rule establishes an exemption from regulation under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) for certain pesticides. EPA has determined that these pesticides, under certain conditions, are of a character not necessary to be regulated under FIFRA in order to carry out the purposes of the Act. EPA has concluded that exemption of products covered by this final rule will not pose unreasonable risks to public health or the environment and will, at the same time, relieve producers of the burden associated with regulation. Pesticidal products that do not meet the conditions of this final rule will continue to be regulated under FIFRA. DATES: This rule became effective May 6, 1996.”

Additional Information, requirements and Active Ingredients Exempted are available in EPA PR Notice 2000-6. In addition, only substances on the EPA Inerts List 4A are permitted to be used as inert ingredients in pesticides that have been exempted from FIFRA, 7 U.S.C. 136 et seq., pursuant to section 25(b) of FIFRA, 7 U.S.C. 136w(b). 224]

Most State Pesticide regulations do not exempt the “FIFRA § 25(b)” products from registration.

ADAMS TECHNOLOGY STATE PESTICIDE REGISTRATION SERVICE CENTER updates this list of the State “FIFRA § 25(b)” registration requirements in the normal course of maintaining the State Registrations for our clients. It is the support of the 52 State (includes DC and PR) Pesticide Offices that helps us keep this list up to date. We are pleased to share the list so the Pesticide Industry knows what each state’s policy is.

Number of states requiring Registration: 38
Number of states exempting products: 14 = CA, CT, GA, HI, IL, MA, MN, MO, NJ, NY, PA, TN, TX and PR
“Rough” Total Registration Fees: \$8,000 per product per year
Must Register but No Fees: 4 = MT, NE, OR, and UT

Note: The last column on the following chart is additional information on the states that require Adverse Effects Reporting similar to that required by the EPA’s FIFRA 6(a)(2) Requirements.

ADAMS TECHNOLOGY SYSTEMS

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ADAMS TECHNOLOGY STATE PESTICIDE REGISTRATION SERVICE CENTER (ATSSC)

Updated: June 17, 2006

State	Register 25b Product?	Information Confirmed	Data?	Fees?	Comments	FIFRA 6(a)(2) Requirements Adverse Effects Reporting?
AK	YES	06/01/2006				NO
AL	YES	06/01/2006			2006 - Now Required	NO
AR	YES	06/01/2006				NO
AZ	YES	06/01/2006				NO
CA	NO*	06/01/2006	YES		*However, exemption is tighter than FIFRA, especially topical use. See CCR section 6147 and California Notice 2000-6 for details. http://www.cdpr.ca.gov/docs/inhouse/calcode/25.htm	YES
CO	YES	06/01/2006	YES*		*Efficacy Data Required for non-DEET Mosquito Repellents	NO
CT	NO	06/01/2006				YES
DC	YES	06/01/2006	YES			NO
DE	YES	06/01/2006			Send copy of Label	NO
FL	YES	06/01/2006			write on application "EPA EXEMPT"	YES
GA	NO	06/01/2006				NO
HI	NO	06/01/2006				NO
IA	YES	06/01/2006	YES*		*Upon request	NO
ID	YES	06/01/2006				NO
IL	NO	06/01/2006				NO
IN	YES	06/01/2006	YES		Full formulation (CSF) and Efficacy Data.	NO
KS	YES	06/01/2006				NO
KY	YES	06/01/2006	YES		Efficacy Data Required	NO
LA	YES	06/01/2006			Use UPC code for registration number	NO
MA	NO	06/01/2006				YES; any adverse affect or spill to be reported to Pesticide Division. Poisoning to be reported to Dept. of Public Health.
MD	YES	06/01/2006				NO

State	Register 25b Product?	Information Confirmed	Data?	Fees?	Comments	FIFRA 6(a)(2) Requirements Adverse Effects Reporting?
ME	YES	06/01/2006				NO
MI	YES	06/01/2006				NO
MN	NO	06/01/2006				NO
MO	NO	06/01/2006				NO
MS	YES	06/01/2006	YES*		*Efficacy may be requested	
MT	YES	06/01/2006		NO	Submit copy of label	NO
NE	YES	06/01/2006		NO	Submit copy of label	NO
ND	YES	06/01/2006				NO
NC	YES	06/01/2006				NO
NH	YES	06/01/2006				NO
NJ	NO	06/01/2006				YES; accidents or adverse effects are to be reported to the state.
NM	YES	06/01/2006	YES*		*Upon Request	NO
NV	YES	06/01/2006				NO
NY	NO	06/01/2006				YES
OH	YES	06/01/2006				NO
OK	YES	06/01/2006	YES*		*Upon Request	NO
OR	YES	06/01/2006		NO	Submit copy of label	NO
PA	NO	06/01/2006				YES; accidents or adverse effects are to be reported to the state.
PR	NO	06/01/2006				
RI	YES	06/01/2006				NO
SC	YES	06/01/2006				NO
SD	YES	06/01/2006	YES*		*Upon Request	NO
TN	NO*	06/01/2006			*Mfg Use Products Only, Submit copy of label	NO
TX	NO	06/01/2006			Texas does not review or approve the labeling but does expect the labeling to be consistent with 40 CFR and PR Notice 2000-6.	NO
UT	YES	06/01/2006		NO	Submit copy of label	NO
VA	YES	06/01/2006				NO
VT	YES	06/01/2006	YES*		Requires a unique number code for registration (UPC code is acceptable). *Efficacy Data may be requested.	NO
WA	YES	06/01/2006				NO
WI	YES	06/01/2006				NO
WV	YES	06/01/2006				NO
WY	YES	06/01/2006				NO

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ADAMS TECHNOLOGY STATE PESTICIDE REGISTRATION SERVICE CENTER (ATSSC)

California Code of Regulations (CCR) section 6147

<http://www.cdpr.ca.gov/docs/inhouse/calcode/25.htm>

6147. Exempted Pesticide Products.

(a) Manufacturers of, importers of, and dealers in the following pesticide products or classes of pesticide products are exempt from the requirements of Division 7 of the Food and Agricultural Code, provided the pesticide products are exempt pursuant to section 25(b)(2) of the Federal Insecticide, Fungicide, and Rodenticide Act [7 U.S.C. sec. 136w(b)(2)]:

(1) Pheromones and identical or substantially similar compounds labeled for use only in pheromone traps (or labeled for use in a manner which the Director determines poses no greater risk of adverse effects on the environment than use in pheromone traps), and pheromone traps in which those compounds are the sole active ingredient(s), as specified in 40 Code of Federal Regulations 152.25(b).

(2) Preservatives for biological specimens, including:

(A) Embalming fluids;

(B) Products used to preserve animal or animal organ specimens, in mortuaries, laboratories, hospitals, museums and institutions of learning; and

(C) Products used to preserve the integrity of milk, urine, blood, or other body fluids for laboratory analysis.

(3) Products consisting of foods that are used to attract pests and which contain no active ingredient(s).

(4) (A) Natural cedar blocks, chips, shavings, balls, chests, drawer liners, paneling, and needles that meet all of the following criteria:

1. The product consists totally of cedar wood or natural cedar.

2. The product is not treated, combined, or impregnated with any additional substance(s).

3. The product bears claims or directions for use solely to repel arthropods other than ticks or to retard mildew, and no additional claims are made in sale or distribution. The labeling must be limited to specific arthropods, or must exclude ticks if any general term such as "arthropods," "insects," "bugs," or any other broad inclusive term is used.

(B) The exemption does not apply to natural cedar products claimed to repel ticks. The exemption also does not apply to cedar oil, or formulated products, which contain cedar oil, other cedar extracts, or ground cedar wood as part of a mixture.

(5)(A) Products containing the following active ingredients alone or in combination with other substances listed in paragraph (5)(A), provided that all the criteria specified in paragraphs (5)(C) and (5)(D) are met:

Castor oil (U.S.P. or equivalent)

Cedar Oil 1

Cinnamon

Cinnamon oil 1

Citric acid 1

Citronella (non-topical uses only)

Citronella oil (non-topical uses only)

Cloves 2

Clove oil 1, 2

Corn gluten meal

Corn oil

Cottonseed oil

Dried blood

Eugenol 1, 2

Garlic

Garlic oil 1

Geraniol 2

Geranium oil 2

Lauryl sulfate 1

Lemongrass oil 1

Linseed oil

Malic acid 1

Mint

Mint oil 1

Peppermint 2

Peppermint oil 1, 2

2-Phenethyl propionate (2-phenylethyl propionate) 1

Potassium sorbate 1

Putrescent whole egg solids

Rosemary 2

Rosemary oil 1, 2

Sesame (includes ground sesame plant)

Sesame oil

Sodium chloride (common salt)

Sodium lauryl sulfate 1, 2

Soybean oil

Thyme 2

Thyme oil 1, 2

White pepper 1

Zinc metal strips (consisting solely of zinc metal and impurities)

1 Products containing 8.5% or more of this active ingredient in the formulated product must at a minimum bear the signal word "CAUTION," the phrase "Keep Out of Reach of Children," appropriate precautionary language, and a requirement for appropriate protective eyewear and gloves.

2 Products containing this active ingredient intended for topical application to human skin must at a minimum bear the signal word "CAUTION," the phrase "Keep Out of Reach of Children," a dermal sensitization precautionary statement, a prohibition against application to the hands of children, and use directions requiring adult supervision during application to children.

(B) Topical use products containing less than or equal to 1 % of the following active ingredients alone or in combination with each other, provided: the product label carries as a minimum the signal word "CAUTION," the phrase "Keep Out Of Reach of Children," a dermal sensitization precautionary statement, a prohibition against application to the hands of children, and use directions requiring adult supervision during application to children, and (ii) all the criteria specified in paragraphs (5)(C) and (5)(D) are met:

Citronella

Citronella oil

(C) A pesticide product exempt under paragraphs (5)(A) and (5)(B) of subsection (a) may include as inert ingredients only those substances listed in the U.S. Environmental Protection Agency's most current List 4A "Inerts of Minimal Concern." U.S. EPA's list of minimal risk inert ingredients is updated periodically and is published in the Federal Register.

(D) In addition, all of the following conditions must be met for products to be exempted under subsection (a)(5):

1. Each product containing the substance must bear a label identifying the name and percentage (by weight) of each active ingredient and the name of each inert ingredient.

2. The product must not bear claims either to control or mitigate microorganisms that pose a threat to human health, including but not limited to disease transmitting bacteria or viruses, or claims to control insects or rodents carrying specific diseases, including, but not limited to ticks that carry Lyme disease.

3. The product must not include any false and misleading labeling statements, including those listed in 40 CFR 156.10(a)(5)(i) through (viii).

(b) Whenever the manufacturer of, importer of, or dealer in any product exempted pursuant to this section has factual or scientific evidence of any adverse effect or risk to human health or the environment that has not previously been submitted to the department, the manufacturer, importer, or dealer shall report the evidence to the department within 60 days of learning of the information.

NOTE: Authority cited: Section 11456, 12781, and 12803, Food and Agricultural Code.

Reference: Section 12803, Food and Agricultural Code.