

APR 28 2011

PETITION TO INCLUDE POLYGLYCERYL PHTHALATE ESTER OF COCONUT
OIL FATTY ACID ONTO 7 CFR §205

Petitioner:

Clariant Corporation
4000 Monroe Rd.
Charlotte, NC 28205

ALL COMMUNICATIONS REGARDING THIS PETITION SHOULD BE DIRECTED
TO

LARRY KESLER
CLARIANT CORPORATION
4000 Monroe Rd.
Charlotte NC 28205
Telephone: 704 331 7728
Email: larry.kesler@clariant.com

April 27, 2011

Clariant Corporation
4000 Monroe Road
Charlotte NC 28205



April 27, 2011

National List Coordinator
USDA/AMS/NOP, Standards Division
1400 Independence Ave. SW
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Dear Sir/Madam,

Clariant Corporation is submitting this petition to support the re-listing of Polyglyceryl phthalate ester of coconut oil fatty acid on the National List of Organic Substances Allowed.

Polyglyceryl phthalate ester of coconut oil fatty acid is a List 4 inert ingredient. This chemical was revoked during EPA reassessments. The Joint Inerts Task Force Cluster Support Team 23 successfully submitted a tolerance petition to EPA's Inert branch. The Exemption from the Requirement of a Tolerance for this compound was published in the Federal Register July 8th, 2009.

Enclosed please find the subject petition for your review.

Please let me know if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Larry Kesler".

Larry Kesler
Senior Product Safety Chemist
Clariant Corporation
Phone 704 331 7728

Email: larry.kesler@clariant.com

NOP Petition for Re-listing of Polyglyceryl Phthalate Ester of Coconut Oil Fatty Acid
(CAS 66070-87-9) in the National List of Substances Allowed

Item A:

This petition is to have Polyglyceryl phthalate ester of coconut oil fatty acid included in the National List within the following category: Synthetic substances allowed for use in organic crop production at §205.601, specifically §205.601(m).

Item B:

1. The substance's chemical or material common name:

polyglyceryl phthalate ester of coconut oil fatty acid

2. The manufacturer's or producer's name, address and telephone number and other contact information of the manufacturer/producer of the substance listed in the petition:

Clariant Corporation

4000 Monroe Rd.

Charlotte NC 28205

Telephone Number: 704 331 7728

3. The intended or current use of the substance such as use as a pesticide, animal feed additive, processing aid, nonagricultural ingredient, sanitizer or disinfectant. If the substance is an agricultural ingredient, the petition must provide a list of the types of product(s) (e.g., cereals, salad dressings) for which the substance will be used and a description of the substance's function in the product(s) (e.g., ingredient, flavoring agent, emulsifier, processing aid).

adjuvant in organic pesticide formulations

4. A list of the crop, livestock or handling activities for which the substance will be used. If used for crops or livestock, the substance's rate and method of application must be described. If used for handling (including processing), the substance's mode of action must be described.

Product would be used as an adjuvant in organic pesticide formulations. Crops would be listed on the EPA approved FIFRA label of the pesticide. Example crops would include, but not limited to, solanaceous vegetables (e.g., eggplant, peppers, tomatoes), legumes (e.g., soybeans, peanuts), corn, cole crops (e.g., cabbage, broccoli), cucurbits (e.g., cucumbers, squash), cereal crops (e.g., sorghum, wheat), cotton, sunflower, citrus (e.g., oranges, grapefruit) fruits (e.g., apples, grapes), lawn and garden. Application rate would range from 0.1 to 25%. Application methods would include, but not limited to spray, powder, and emulsion.

5. The source of the substance and a detailed description of its manufacturing or processing procedures from the basic component(s) to the final product. Petitioners with concerns for confidential business information may follow the guidelines in the Instructions for Submitting CBI listed in #13.

Polyglyceryl Phthalate Esters of Coconut Oil Fatty Acids are derived from the condensation products of coconut fatty acid, glycerol and phthalic acid anhydride and are extremely complex mixtures. The coconut fatty acid is crosslinked via an ester bond to any one of the hydroxyl groups of the polyglycerol mixture. The phthalate derived from phthalic anhydride acid is also crosslinked to the hydroxyl groups of the polyglycerol mixture by way of an ester bond. The nature and extent of crosslinking varies widely and may be affected by the order of addition of the coconut fatty acids and/or the phthalic acid anhydride. In addition to the crosslinking of the terminal glycerol hydroxyls, crosslinking of the secondary glycerol hydroxyls may also occur.

6. A summary of any available previous reviews by State or private certification programs or other organizations of the petitioned substance. If this information is not available, the petitioner should state so in the petition.

Polyglyceryl phthalate ester of coconut oil fatty acid (CAS Reg. No. 66070-87-9) was revoked by EPA in the 71 FR 45415, August 9, 2006.

The Joint Inerts Task Force, Cluster Support Team 23 submitted a petition that requested an exemption from the requirement of a tolerance for residues of polyglyceryl phthalate ester of coconut oil fatty acids.

In the Federal Register of July 8, 2009, EPA's Office of Pesticide Programs issued an exemption from the requirement of a tolerance for polyglyceryl phthalate ester of coconut oil fatty acids. EPA issues a technical correction correcting the CAS number that was published in the Federal Register of April 21, 2010.

7. Information regarding EPA, FDA, and State regulatory authority registrations, including registration numbers. If this information does not exist, the petitioner should state so in the petition.

Polyglyceryl phthalate ester of coconut oil fatty acids (CAS Reg. No. 66070-87-9) was previously listed on EPA list 4B. Polyglyceryl phthalate ester of coconut oil fatty acid (CAS Reg. No. 66070-87-9) was revoked by EPA in the 71 FR 45415, August 9, 2006.

The Joint Inerts Task Force, Cluster Support Team 23 submitted a petition that requested an exemption from the requirement of a tolerance for residues of polyglyceryl phthalate ester of coconut oil fatty acids. In the Federal Register of July 8, 2009, EPA's Office of Pesticide Programs issued an exemption from the requirement of a tolerance for polyglyceryl phthalate ester of coconut oil fatty acids. EPA issues a technical correction correcting the CAS number that was published in the Federal Register of April 21, 2010.

8. The Chemical Abstract Service (CAS) number or other product numbers of the substance and labels of products that contains the petitioned substance. If the substance does not have an assigned product number, the petitioner should state so in the petition.

CAS 66070-87-9 and CAS 67746-02-5

9. The substance's physical properties and chemical mode of action including
 (a) Chemical interactions with other substances, especially substances used in organic production; (b) toxicity and environmental persistence; (c) environmental impacts from its use and/or manufacture; (d) effects on human health; and, (e) effects on soil organisms, crops, or livestock.

(a)

Data, either empirically derived or modeled is not available for the Polyglyceryl phthalate ester of coconut oil fatty acid. Therefore, Clariant provides the values found on the Material Safety Data Sheet for Synergen B01 (CAS 67746-02-5) to serve as a representative Polyglyceryl phthalate ester of coconut oil fatty acid.

Color	Brownish
Odor	Slight, original Odor
Octanol/Water Partition Coeff.	-4.90 (Method: Calculated by Syracuse).
Boiling Point	212°F (1013 mbar) Based on water-content.
Melting Point	<30°F
Vapor Pressure	Not tested
Water Solubility	Miscible in all proportions
Viscosity (dynamic)	approx. 1,670 mPa.s (20°C) (Method: DIN 53015)
pH	3 - 8 (20°C, 50 g/l) (Method: DIN EN 1262)
Density	approx. 1.176 g/cm ³ (20°C) (Method: ISO/DIS 12185)

¹ Table values taken directly from submission entitled "*Petition Proposing An Exemption From The Requirement Of A Tolerance For Residues Of Joint Inerts Task Force Cluster 23 "Polyglyceryl Phthalate Ester Of Coconut Fatty Acids"* page 11, dated October 30, 2008.

Chemical interactions with other substances, especially substances used in organic production, are not expected.

(b) toxicity and environmental persistence from Synergen B 01 msds

Acute oral toxicity: LD50 > 2000 mg/kg (rat), Method: OECD 401

Acute dermal toxicity: LD50 > 2000 mg/kg (rat), Method: OECD 402

Irritant effect on skin: non-irritant (rabbit), Method: OECD 404

Irritant effect on eyes: non-irritant (rabbit eye), Method: OECD 405

Sensitization: non-sensitizing, Method: OECD 406 1981 Buehler test

Daphnia toxicity: EC 50>100 mg/l (48 H, Daphnia magna), Method OECD 202

Algae toxicity: EL50>100mg/l (72 h, Green algae-fresh water) Method OECD 201

Bacteria toxicity: EC50 38 mg/l Method: DIN EN ISO 11348-2

The available toxicology data are sufficient to support the uses of Polyglyceryl phthalate ester of coconut oil fatty acid as inert ingredients in pesticide formulations. EPA's Health Effects Division concluded that the available toxicity data were conducted on a test material that is representative of the chemicals in the Polyglyceryl phthalate ester of coconut oil fatty acid grouping. (Joint ToxSAC/ROCKS meeting 3/12/09, memo from J. Kidwell).

10. Safety information about the substance including a Material Safety Data Sheet (MSDS) and a substance report from the National Institute of Environmental Health Studies. If this information does not exist, the petitioner should state so in the petition.

See Attachment #1 for Synergen B 01 material safety data sheet

A substance report from the National Institute of Environmental Health Studies is not available.

11. Research information about the substance which includes comprehensive substance research reviews and research bibliographies, including reviews and bibliographies which present contrasting positions to those presented by the petitioner in supporting the substance's inclusion on or removal from the National List. For petitions to include non-organic agricultural substances onto the National List, this information item should include research concerning why the substance should be permitted in the production or handling of an organic product, including the availability of organic alternatives. Commercial availability does not depend upon geographic location or local market conditions. If research information does not exist for the petitioned substance, the petitioner should state so in the petition.

Clariant Corporation is not aware of any published literature which present contrasting positions to those presented herein. See Attachment #2 for literature search.

12. A "Petition Justification Statement" which provides justification for any of the following actions requested in the petition:

A. Inclusion of a Synthetic on the National List, §§ 205.601, 205.603, 205.605(b)

- Explain why the synthetic substance is necessary for the production or handling of an organic product.

Polyglyceryl phthalate ester of coconut oil fatty acid will improve the solubility of many of the actives approved for pesticides on the National List. The use of Polyglyceryl phthalate ester of coconut oil fatty acid will reduce application problems and increase coverage resulting in lower application.

- Describe any non-synthetic substances, synthetic substances on the National List or alternative cultural methods that could be used in place of the petitioned synthetic substance.

There is no material which shows similar adjuvants performance and dispersing properties in one product, which improves handling and safety, as only one raw material is required instead of several to get the same effect.

- Describe the beneficial effects to the environment, human health, or farm ecosystem from use of the synthetic substance that support its use instead of the use of a non-synthetic substance or alternative cultural methods

Polyglyceryl phthalate ester of coconut oil fatty acids is non-toxic, non-irritating adjuvant used in pesticide formulations. Polyglyceryl phthalate ester of coconut oil fatty acids is sourced from renewable resources. Less pesticide use is a benefit to the ecosystem.

One method of weed control is pulling them out of the ground. The benefit of polyglyceryl phthalate ester of coconut oil fatty acid is providing an inert that will improve the application of many of the pesticides on the National List resulting in a reduced amount of physical labor with no negative impact on the environment.

Polyglyceryl phthalate ester of coconut oil fatty acid is a List 4 inert ingredient. This chemical was revoked during EPA reassessments. The Joint Inerts Task Force Cluster Support Team 23 successfully submitted a tolerance petition to EPA's Inert branch. The Exemption from the Requirement of a Tolerance for this compound was published in the Federal Register July 8th, 2009.

13. Confidential Business Information Section

No information contained in this petition is Confidential Business Information.

ATTACHMENT 1

Synergen B 01 Material Safety Data Sheet

MATERIAL SAFETY DATA SHEET**Synergen B 01**

Page 1

Substance key: 000000105428
Version : 1 - 4 / USARevision Date: 03/09/2011
Date of printing :03/09/2011**Section 01 - Product Information****Identification of the company:**Clariant Produkte (Deutschland) GmbH
Frankfurt am Main, 65926
Telephone No.: +49 69 305 18000**Information of the substance/preparation:**

Product Safety 1-704-331-7710

Emergency tel. number: +1 800-424-9300 CHEMTREC**Trade name:****Synergen B 01****Primary product use:**

Auxiliary for formulating plant protection products

Chemical family:Copolymer of glycerol/coconut oil fatty acid/phthalic anhydride
approx. 70% in water**Section 02 - Composition information on hazardous ingredients****Hazardous ingredients:**None under 29 CFR 1910.1200
None under Title III of SARA**Section 03 - Hazards identification****Emergency overview:**Brown liquid.
NO KNOWN HAZARDS.**Expected Route of entry:****Inhalation:**Not expected to be toxic by inhalation.
Not expected to be irritating to the respiratory tract.**Skin contact:**Not expected to be irritating to skin.
Not expected to be toxic by skin absorption.**Eye contact:**

Not expected to be irritating to the eyes.

Ingestion:

Not expected to be toxic.

Known effects on other illnesses:

None known.

Listed carcinogen:IARC: NO NTP: NO OSHA: NO
Other: No**HMIS:**

Health: 1

Flammability: 1

Reactivity: 0

Personal protection: D

Section 04 - First aid measures**After inhalation:**Remove victim to fresh air.
Consult physician if irritation or other symptoms occur.

MATERIAL SAFETY DATA SHEET
Synergen B 01Substance key: 000000105428
Version : 1 - 4 / USARevision Date: 03/09/2011
Date of printing :03/09/2011**After contact with skin:**Wash area with mild soap and copious amounts of water.
Seek medical attention if pain or irritation occurs.**After contact with eyes:**

Immediately flush eyes with running water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Seek prompt medical attention if redness or irritation occurs.

After ingestion:

Consult physician.

Advice to doctor / Treatment:

None known.

Section 05 - Fire fighting measures

Flashpoint:	426 °F Method: DIN EN 22719 / ISO 2719 (closed cup)
Lower explosion limit:	not tested.
Upper explosion limit:	not tested.
Self ignition:	not self-igniting
Ignition temperature:	824 °F Method: DIN 51794
Hazardous combustion products:	Glycerine derivative! Risk of formation of acrolein in a fire
Extinguishing media:	water spray jet alcohol-resistant foam dry powder carbon dioxide
Special fire fighting procedure:	Wear full protective clothing and NIOSH/MSHA-approved positive pressure, self-contained breathing apparatus.

Section 06 - Accidental release measures**Steps to be taken in case of spill or leak:**

Wearing appropriate personal protective equipment, contain spill and collect into a suitable container.

Section 07 - Handling and storage**Advice on safe handling:**Keep away from heat and flame.
Avoid breathing vapors and contact with skin, eyes, and clothing.
Use only with adequate ventilation and proper protective eyewear, gloves, and clothing.
Keep container closed.

MATERIAL SAFETY DATA SHEET
Synergen B 01

Page 3

Substance key: 000000105428
Version : 1 - 4 / USARevision Date: 03/09/2011
Date of printing :03/09/2011**Further info on storage conditions:**
Store in a cool, dry, well-ventilated area.**Section 08 - Exposure controls / personal protection**

Respiratory protection:	If airborne concentrations pose a health hazard, become irritating, or exceed recommended limits, use a NIOSH approved respirator in accordance with OSHA respiratory protection requirements under 29CFR1910.134.
Hand protection:	Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water.
Eye protection:	Chemical splash goggles.
Other protective equipment:	Clothing suitable to prevent skin contact.
Advice on system design:	Where a closed system is not used, good enclosure and local exhaust ventilation should be provided.
IDLH:	None For This Product

Section 09 - Physical and chemical properties

Form:	Liquid
Color:	brownish
Odor:	slight, original odour
Odor limit:	not tested.
pH:	3 - 7 (20 °C, 50 g/l) Method: DIN 1262
Solubility in water:	miscible in all proportions
Soluble in ... :	fat not tested.
Density:	approx. 1.176 g/cm ³ (20 °C) Method: ISO/DIS 12185
Density:	1.147 g/cm ³ (60 °C) Method: ISO/DIS 12185
Solidifying Point :	< 32 °F Method: DIN 51583
Boiling temperature :	> 212 °F (1,013 mbar) Based on water-content.
Vapor pressure:	not tested.
Bulk density:	Not applicable
Relative vapor density:	not tested.

MATERIAL SAFETY DATA SHEET
Synergen B 01

Page 4

Substance key: 000000105428
Version : 1 - 4 / USARevision Date: 03/09/2011
Date of printing :03/09/2011

Partitioning coef. octanol/water:	-4.90 Method: Calculated by Syracuse.
Viscosity / (dynamic):	1,670 mPa.s (20 °C) Method: DIN 53015
Viscosity / (dynamic):	173 mPa.s (60 °C) Method: DIN 53015
Viscosity / (kinematic):	not tested.

Section 10 - Stability and reactivity

Thermal decomposition:	from 330 °C (Heating rate:3 K/min) Method: DSC
Chemical stability:	Under normal conditions the product is stable.
Conditions to avoid:	None known.

Section 11 - Toxicological information

Product information:	
Acute oral toxicity:	LD50 > 2,000 mg/kg (rat) Method: OECD 401
Acute inhalation toxicity:	not tested.
Acute dermal toxicity:	LD50 > 2,000 mg/kg Method: OECD 402
Skin irritation:	non-irritant
Eye irritation:	non-irritant (rabbit eye) Method: OECD 405
Sensitization:	non-sensitizing Method: OECD 406 Information based on the active ingredient.

Other relevant toxicity information:
The data on toxicology refer to the active ingredient.

Section 12 - Ecological information

Product information:	
Biodegradation:	42 % (28 d) Method: OECD 301 B
Fish toxicity:	LL50 > 100 mg/l (96 h, zebra fish) Method: OECD 203 LL50 > 100 mg/l (96 h, rainbow trout) Method: OECD 203

MATERIAL SAFETY DATA SHEET
Synergen B 01

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Substance key: 000000105428
Version : 1 - 4 / USARevision Date: 03/09/2011
Date of printing :03/09/2011

Daphnia toxicity:	EC50 > 100 mg/l (48 h, Daphnia magna) Method: OECD 202
Algae toxicity:	EL50 > 100 mg/l (72 h, Green algae - fresh water (Pseudokirchneriella subcapitata)) Method: OECD 201
Bacteria toxicity:	EC50 38 mg/l Method: DIN EN ISO 11348-2
Dissolved organic carbon (DOC):	559 mg/g Method: DIN/EN 1484
Chemical oxygen demand (COD):	1,937 mg/g Method: ISO/DIS 15705

Remarks:

The ecological data given are those of the active ingredient.

Section 13 - Disposal considerations**Waste disposal information:**

Properly containerize and label waste material.

Dispose of any waste residues according to prescribed federal, state and local guidelines, e.g. appropriately permitted chemical waste incinerator.

RCRA hazardous waste:

No -- Not as sold.

Section 14 - Transport information

DOT	not restricted
IATA	not restricted
IMDG	not restricted

Section 15 - Regulatory information**TSCA Status:**

This product is listed on the TSCA Inventory.

SARA (section 311/312):

Reactive hazard:	no
Pressure hazard:	no
Fire hazard:	no
Immediate/acute:	no
Delayed/chronic:	no

SARA 313 information:

This product does not contain any toxic chemical listed under Section 313 of the Emergency Planning and Community Right-To-Know Act of 1986.

Clean Water Act:

MATERIAL SAFETY DATA SHEET
Synergen B 01

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Substance key: 000000105428
Version : 1 - 4 / USA

Revision Date: 03/09/2011
Date of printing :03/09/2011

This product is not a Clean Water Act priority pollutant.

Section 16 - Other information**Label information:**

ATTENTION!

UPON EVALUATION, IT HAS BEEN DETERMINED THAT THIS PRODUCT IS NOT SUBJECT TO THE LABELING REQUIREMENTS OF OSHA REGULATION 29CFR 1910.1200. HOWEVER, GOOD WORK PRACTICES DICTATE THAT CARE BE TAKEN TO AVOID SKIN AND EYE CONTACT AND INGESTION. WASHING AFTER HANDLING IS ADVISED.

Avoid breathing dust. Keep Container closed, use with adequate ventilation. Avoid contact with eyes, skin and clothing. Wear proper protective equipment.

In case of EYE CONTACT, flush with water for 15 minutes while holding eyelids open.
SKIN CONTACT: Wash thoroughly with soap and water. Seek medical attention if irritation occurs. For inhalation, remove to fresh air, consult a physician.

This information is supplied under the OSHA Hazard Communication Standard, 29 CFR 1910.1200, and is offered in good faith based on data available to us that we believe to be true and accurate. The recommended industrial hygiene and safe handling procedures are believed to be generally applicable to the material. However, each user should review these recommendations in the specific context of the intended use and determine whether they are appropriate for that use. No warranty, express or implied, is made regarding the accuracy of this data, the hazards connected with the use of the material, or the results to be obtained from the use thereof. We assume no responsibility for damage or injury from the use of the product described herein. Data provided here are typical and not intended for use as product specifications.

ATTACHMENT 2

Literature Search

Search Report Scientific Information

Ref. no.:	Date of search:	Range covered by the search:	Executed by:
KeslerL_2011_01_31_01	10.02.2011	n. a.	S. Aust

Completeness index range 1-15; 15 = highest level, 1 = lowest level; if the search result is used to file a patent application the completeness index should be 10 at least. Click here for details	6	Billing Reference (Cost Center, Org.-Unit
		internal charging
Feedback to Scientific Information We would be grateful to get your feedback on the service we provided. Link to Feedback Form		

Search Topic:

Literature references for Registry-Number 66070-87-9

Databases used:

Database:	Coverage:	Content:	Used ("X")
Reaxys	1779 -	Gmelin, Beilstein, Patent Chemistry DB	
CAplus	1907 -	Biochemistry, chemistry and chemical engineering (journals, patents etc.)	
Frankfurt Colour Resource I *	1940 - 1970	Colorants (patents)	
Clariant Colour Resource II *	1970 - 1995	Colorants (patents)	
Basler Ring	1963-1989	Colorants (patents)	
Reports PA KM *	1991 - 2003	Clariant research reports	
Derwent (WPIX)	1963 -	International patents	
Muttenz Colour Resource *	1930 - 1962	Colorants (patents)	
Prodid *	1970 -	Pigments	
Marpat	1988 -	Markush structures in patents	
Merged Markush Service	1982 -	Markush and specific structures in patent claims	
Registry	1957 -	Chemical substances ("structures")	x
Scientific Reports *	1960 - 1995	Hoechst research reports	

* Results are attached as separate files.

Other Databases / Sources used:

Rtecs, Uspatfull, Chemlist, Toxcenter

Summary of the search strategy

(search keywords and question strings that clarify the search's scope):

Search with Registry-Number

Remarks:

Retrieved documents:

Please note:

All information from commercial databases are copyright protected and may not be reproduced, distributed and /or freely archived, i.e. the use of the provided information is subject to all of the corresponding terms and conditions of the database owner (CAS, THOMSON DERWENT, etc.).

Concerning patent references: Via the [Full-text](#) link behind the accession number ("Strg + left mouse button" or "right mouse button -> open hyperlink") you'll be routed, if available, to web-based document resources (mostly Espacenet) where you can read directly the original document. Don't hesitate to contact GTS Scientific Information if you have any questions concerning this service.

FILE 'REGISTRY' ENTERED AT 15:48:43 ON 10 FEB 2011
USE IS SUBJECT TO THE TERMS OF YOUR STN CUSTOMER AGREEMENT.
PLEASE SEE "HELP USAGETERMS" FOR DETAILS.
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Regisry-Display of 66070-87-9

L9 ANSWER 1 OF 1 REGISTRY COPYRIGHT 2011 ACS on STN
RN 66070-87-9 REGISTRY *
* Use of this CAS Registry Number alone as a search term in other STN files may result in incomplete search results. For additional information, enter HELP RN* at an online arrow prompt (=>).
ED Entered STN: 16 Nov 1984
CN Coconut oil, polymer with glycerol and phthalic anhydride (CA INDEX NAME)
OTHER NAMES:
CN Phthalic anhydride-glycerol-coconut oil polymer
MF (C8 H4 O3 . C3 H8 O3 . Unspecified)x
AF Unspecified
CI PMS, MAN, CTS
PCT Manual registration
LC STN Files: CHEMLIST, RTECS*, TOXCENTER, USPATFULL
(*File contains numerically searchable property data)
Other Sources: DSL**, TSCA**
(**Enter CHEMLIST File for up-to-date regulatory information)

THE COMPLETE SUBSTANCE MAY NOT BE REPRESENTED BY THESE COMPONENTS. CHECK THE CN OR IN FIELD FOR THE COMPLETE SUBSTANCE DESCRIPTION.

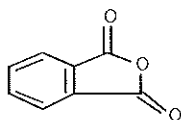
CM 1

CRN 8001-31-8
CMF Unspecified
CCI MAN, CTS

*** STRUCTURE DIAGRAM IS NOT AVAILABLE ***

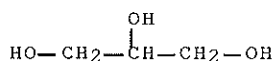
CM 2

CRN 85-44-9
CMF C8 H4 O3



CM 3

CRN 56-81-5
CMF C3 H8 O3



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FILE COVERS 1907 TO 8 Feb 2011 (20110208/ED)

L10 2 L9

Two references of Toxcenter

L10 ANSWER 1 OF 2 TOXCENTER COPYRIGHT 2011 ACS on STN
AN 2002:583276 TOXCENTER Full-text
DN TSCATS-017354
TI SALMONELLA/MAMMALIAN - MICROSOME PLATE INCORPORATION MUTAGENESIS ASSAY
CS EG&G MASON RES INST
ON NTIS-OTS0206119
SO EPA/OTS; Doc #878210688.
FS TSCATS
ED Entered STN: Dec 2002
Last Updated on STN: Dec 2002
CC TSCA Sect. 8D Rec 12/30/82
ST Miscellaneous Descriptors
MOBIL OIL CORP; TOLUENE (108-88-3); HEALTH EFFECTS; GENOTOXICITY; GENE
MUTATIONS; BACTERIA; IN VITRO
RN 108-88-3; 66070-87-9

L10 ANSWER 2 OF 2 TOXCENTER COPYRIGHT 2011 ACS on STN
AN 2002:583275 TOXCENTER Full-text
DN TSCATS-017353
TI EVALUATION OF TEST ARTICLE MCTR-120-79 (MRI #300) FOR MUTAGENIC POTENTIAL
EMPLOYING THE L5178Y TK+/- MUTAGENESIS ASSAY
CS EG&G MASON RES INST
ON NTIS-OTS0206119
SO EPA/OTS; Doc #878210687.
FS TSCATS
ED Entered STN: Dec 2002
Last Updated on STN: Dec 2002
CC TSCA Sect. 8D Rec 12/30/82
ST Miscellaneous Descriptors
MOBIL OIL CORP; TOLUENE (108-88-3); HEALTH EFFECTS; GENOTOXICITY; GENE
MUTATIONS; MAMMALS; MICE; IN VITRO
RN 108-88-3; 66070-87-9

FILE 'USPATFULL' ENTERED AT 15:52:32 ON 10 FEB 2011
CA INDEXING COPYRIGHT (C) 2011 AMERICAN CHEMICAL SOCIETY (ACS)
FILE COVERS 1971 TO PATENT PUBLICATION DATE: 10 Feb 2011 (20110210/PD)
FILE LAST UPDATED: 10 Feb 2011 (20110210/ED)
HIGHEST GRANTED PATENT NUMBER: US7886366
HIGHEST APPLICATION PUBLICATION NUMBER: US20110035854
CA INDEXING IS CURRENT THROUGH 6 Feb 2011 (20110206/UPCA)
ISSUE CLASS FIELDS (/INCL) CURRENT THROUGH: 10 Feb 2011 (20110210/PD)
REVISED CLASS FIELDS (/NCL) LAST RELOADED: Oct 2010
USPTO MANUAL OF CLASSIFICATIONS THESAURUS ISSUE DATE: Oct 2010

Three references of Uspatfull (patents)

L11 ANSWER 1 OF 3 USPATFULL on STN
AN 2007:106575 USPATFULL Full-text
TI Natural insect repellent
IN Mills, Matthew A., Woodland Hills, CA, UNITED STATES

PI US 20070092544 A1 20070426
 AI US 2005-209529 A1 20050823 (11)
 DT Utility
 FS APPLICATION
 LREP CISLO & THOMAS, LLP, 233 WILSHIRE BLVD, SUITE 900, SANTA MONICA, CA,
 90401-1211, US
 CLMN Number of Claims: 15
 ECL Exemplary Claim: 1
 DRWN No Drawings
 AB Disclosed is a pesticide method and composition utilizing a mixture of cedar and
 cinnamon oils as active pesticide agents in an inert carrier. The composition may
 also utilize a surfactant. Exemplary embodiments disclosed herein may include up
 to 8.5% by volume of cedar oil, up to 8.5% cinnamon oil, lemon juice, water, and
 other ingredients, as desired. Exemplary embodiments may be utilized to repel
 insects, rodents and other things from humans and animals as well as surfaces and
 areas that people and pets may be near. The exemplary embodiments may provide
 this repellent without the harmful effects of other chemicals and repellants.

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

CAS PREFIX NAME

...
 66070-87-9 Polyglyceryl phthalate ester of coconut oil fatty acid 4B
 ...

L11 ANSWER 2 OF 3 USPTAFULL on STN
 AN 2007:56550 USPTAFULL Full-text
 TT LIMONENE-CONTAINING HERBICIDE COMPOSITIONS, HERBICIDE CONCENTRATE
 FORMULATIONS AND METHODS FOR MAKING AND USING SAME FOR ORGANIC
 PRODUCTION
 IN Messerschmidt, Olav, East Lansing, MI, UNITED STATES
 Jankauskas, Joseph, Dacula, GA, UNITED STATES
 PI US 20070049496 A1 20070301
 AI US 2006-556287 A1 20061103 (11)
 RLI Continuation-in-part of Ser. No. WO 2006-US7426, filed on 2 Mar 2006,
 PENDING Continuation-in-part of Ser. No. US 2005-71398, filed on 2 Mar
 2005, PENDING
 DT Utility
 FS APPLICATION
 LREP WOODARD, EMHARDT, MORIARTY, MCNETT & HENRY LLP, 111 MONUMENT CIRCLE,
 SUITE 3700, INDIANAPOLIS, IN, 46204-5137, US
 CLMN Number of Claims: 58
 ECL Exemplary Claim: 1
 DRWN 8 Drawing Page(s)
 AB Provided are methods, kits and compositions suitable for use in organic
 production for killing, controlling or suppressing a plant by administering to
 surfaces of the plant a herbicide composition comprising a herbicidally effective
 limonene component and an emulsifying agent in an aqueous emulsion, wherein the
 composition has a pH greater than 5. Also provided are methods, kits and
 compositions for killing, controlling or suppressing a plant, comprising
 administering to surfaces of the plant a herbicide composition comprising a
 herbicidally effective limonene component and an emulsifying agent in an aqueous
 emulsion, wherein the composition includes a wetting agent and an optional oil.
 Also provided are methods, kits and compositions for killing, controlling or
 suppressing a plant, comprising administering to surfaces of the plant a
 herbicide composition comprising a herbicidally effective limonene component, an
 emulsifying agent and optionally an added oil component in an aqueous emulsion,
 wherein the composition has a pH greater than 5 and includes a wetting agent. All
 components of the compositions suitable for use in organic production contain
 components which are either natural products obtained by non-chemical means
 and/or are included on the Environmental Protection Agency's List of Inert
 Ingredients (List 4A and 4B).

APPENDIX A

U.S. Environmental Protection Agency
List of Inert Pesticide Ingredients

CAS # Name

66070-87-9 Polyglyceryl phthalate ester of
coconut oil fatty acid

L11 ANSWER 3 OF 3 USPATFULL on STN

AN 83:6917 USPATFULL Full-text

TI Combination scratch filler and primer in aerosol form

IN Kendall, Stanley E., Wilmette, IL, United States

PA American Home Products Corporation, New York, NY, United States (U.S.
corporation)

PI US 4372991 19830208

AI US 1981-291657 19810810 (6)

DT Utility

FS Granted

REP US 3087835 Apr 1963 106/195.000 Auer

US 3093497 Jun 1963 106/059.000 Demaison

US 3536509 Oct 1970 106/196.000 Tay

US 3873475 Mar 1975 117/002.000 Pechacek et al.

US 4042539 Aug 1977 260/016.000 Fanning

US 4089994 May 1978 427/140.000 Mattsson et al.

US 4197221 Apr 1980 106/195.000 Eisenmenger

US 4217376 Aug 1980 427/142.000 Donermeyer et al.

US 4249953 Feb 1981 106/195.000 Keifer et al.

EXNAM Primary Examiner: Morris, Theodore

LREP Weigman, Joseph Martin

CLMN Number of Claims: 3

ECL Exemplary Claim: 1

DRWN No Drawings

AB A combination scratch filler and primer for painted metal surfaces can be dispensed in an aerosol system. The composition has a high solids content and an anti-settling agent to make the solids readily dispersible even after long storage. The solids content is preferably 45 to 51 percent by weight of the concentrate and from 19 to 22 percent by weight of the concentrate, solvents and propellant. The anti-settling agent is present in a volume ratio to the solids of 1:10 to 1:50.

Ingredient B is coconut oil modified alkyd resin and acts as a film-former and plasticizer and prevents cracking. CAS Number 66070-87-9.

FILE 'CHEMLIST' ENTERED AT 15:53:28 ON 10 FEB 2011

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PLEASE SEE "HELP USAGETERMS" FOR DETAILS.

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L12 ANSWER 1 of 1 CHEMLIST COPYRIGHT 2011 ACS on STN

AN 33195 CHEMLIST

RN 66070-87-9

CN Coconut oil, polymer with glycerol and phthalic anhydride (TSCA, DSL, ASIA-PAC, NZIoC)

Huile de noix de coco polymerisee avec le glycerol et l'anhydride phtalique (French) (DSL)

Coconut oil, fatty acids, polymer with glycerol and phthalic anhydride (AICS)

Coconut oil polymer with glycerol and phthalic anhydride (ECL)

1,2,3-Propanetriol, 1,3-isobenzofurandione, coconut oil polymer

1,2-Benzenedicarboxylic anhydride, glycerin, coconut oil polymer

Coconut oil fatty acids, phthalic anhydride, glycerin polymer
 Coconut oil, glycerin, phthalic anhydride polymer
 Coconut oil, glycerin, phthalic anhydride resin
 Coconut oil, glycerine, phthalic anhydride polymer
 Coconut oil, glycerol, phthalic anhydride alkyd resin
 Coconut oil, glycerol, phthalic anhydride polymer
 Coconut oil, glycerol, phthalic anhydride resin
 Coconut oil, phthalic anhydride, glycerin polymer
 Coconut oil, phthalic anhydride, glycerol polyester
 Coconut oil, phthalic anhydride, glycerol polymer
 Coconut oil, phthalic anhydride, glycerol resin
 Coconut oil-phthalic anhydride-glycerin resin
 Glycerine, phthalic anhydride, coconut oil fatty acid polymer
 Phthalic anhydride, coconut oil, glycerin polymer
 Phthalic anhydride, glycerin, coconut oil polymer
 Phthalic anhydride-glycerol-coconut oil polymer
 Poly(coconut oil/glycerol/phthalic anhydride)

FS ASIA-PACIFIC: ASIA-PAC; AUSTRALIA: AICS; CANADA: DSL; KOREA: ECL; NEW
 ZEALAND: NZIoC; USA: FIFRA, TSCA

CBI Public

UVCB Alkyd resins, coconut oil

RLN ECL Serial No.: KE-06202

INV On TSCA Inventory
 June 2010 TSCA Inventory.
 EPA Flags:
 XU Exempt from Update Rule

On DSL
 Supplement to Canada Gazette, Part I, January 26, 1991.

On AICS
 Australian Inventory of Chemical Substances, June 1996 Ed.

On ECL
 Korean Existing Chemicals List, January 1997.

On ASIA-PAC

On NZIoC
 New Zealand Inventory of Chemicals, 2006.

FA RN CAS Registry Number
 RLN Regulatory List Number
 INV Inventory Status
 PII EPA Pesticide Inert Ingredients (FIFRA)

==== U.S. EPA Regulations - FIFRA ====

PII EPA Pesticide Inert Ingredients
 URL: <http://www.epa.gov/oppr001/inerts/lists.html> (22 May 2002).
 This substance is classified as List 4B: Inert Ingredients
 Listed Name(s): Polyglyceryl phthalate ester of coconut oil fatty acid

PII EPA Pesticide Inert Ingredients
 Fed. Regist. 60 #130:35396 (07 Jul 1995).
 List 4B: Inert Ingredients
 This substance has be reclassified from List 3: Inerts of unknown
 toxicity.
 Reclassified: 07 Jul 1995.
 Listed Name(s): Polyglyceryl phthalate ester of coconut oil fatty acid.

PII EPA Pesticide Inert Ingredients
 EPA List of Pesticide Product Inert Ingredients (May 1995)
 Listed Name(s): Polyglyceryl phthalate ester of coconut oil fatty acid.

FILE 'RTECS' ENTERED AT 15:56:45 ON 10 FEB 2011
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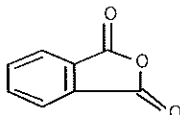
L13 ANSWER 1 of 1 RTECS COPYRIGHT 2011 U.S. GOVERNMENT on STN
 CAS Registry Number (RN): 66070-87-9 RTECS
 RTECS Number (RTN): GG6380000

Chemical Name (CN): Coconut oil fatty acids, polymer with glycerol and phthalic anhydride;
Polyglyceryl phthalate ester of coconut oil fatty acid
Entry/Update Date (DATE): Apr 2010
Character Count: 316

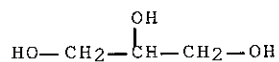
CM 1

*** STRUCTURE DIAGRAM IS NOT AVAILABLE ***

CM 2



CM 3



TOXICOLOGY REVIEW (TREV):
TOXICOLOGY REVIEW FEREAC 74,32456,2009

TOXICOLOGY REVIEW REFERENCES:
FEREAC Federal Register (U.S. Government Printing Office, Supt. of Documents,
Washington, DC 20402) V.1- 1936-

STN INTERNATIONAL SESSION SUSPENDED AT 15:57:27 ON 10 FEB 2011