

# AD Confidential Statement of Formula (CSF) Best Practices



Developed by: The Antimicrobials Division (AD) Regulatory Management and Science Branch (RMSB)

Presented by: Shanta Adeeb, Senior Regulatory Science Advisor for RMSB

Updated January 23, 2023

# Outline


- Ideal Order of Ingredients on the CSF
- Commodity Inert website
- Confidential Appendix Memos
- Dye and Fragrance Guidance
- Certified Limits
- CSF Examples
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- Resource List
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# Ideal Order of Ingredients on CSF 8570-4 Form

List as introduced into the formula *or*:

- **Active Ingredient** - top of form
- **Inert(s)** - pH buffer, surfactant, thickener, surfactant, etc.
- **Dye(s)** - above diluent
- **Fragrance(s)** -above diluent
- **Dilutant/Balance** - last

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

 United States <b>Environmental Protection Agency</b> Washington, DC 20460		A. <input checked="" type="checkbox"/> Basic Formulation <input type="checkbox"/> Alternative Formulation	B. Page 1 of 3	See Instructions on Back				
<b>Office of Pesticide Programs (7505C) – Confidential Statement of Formula</b>								
1. Name and Address of Applicant/Registrant (Include ZIP Code) ABC Company 123 Any Street Anytown, ST, USA 12345		2. Name and Address of Producer (Include ZIP Code) Name and Address of appropriate company contact for production-related questions (I.e, party responsible for production) See attachment						
3. Product Name Pesticide End Product		4. Registration No./File Symbol 00000-99	5. EPA Product Mgr/Team No.	6. Country Where Formulated USA (see also attachment)				
		7. Pounds/Gal or Bulk Density Xx	8. pH xx	9. Flash Point/Flame Extension xx				
EPA USE ONLY	10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number)	11. Supplier Name and Address	12. EPA Reg No.	13. Each Component in Formulation		14. Certified Limits % by Weight		15. Purpose in Formulation
				a. Amount (lb)	b. % by weight	a. Upper Limit	b. Lower Limit	
	Active ingredient chemical (50% ai) CAS No. xxx-xx-xxxx	Company D 456 Main Street Anothertown, ST, USA 67890	9999-99	25	25.0 (12.5)	(12.88)	(12.12)	Active ingredient
	Everyday Chem® ABC (chemical ABC) CAS No. 1234-56-7	Company E 11 Elm Street Town, ST, USA 54321  also, see attachment		26.5	26.5	27.30	25.70	Surfactant
	Best Stuff® Proprietary mixture	Supplier Address		0.5	0.5	0.55	0.45	Fragrance
	Common Stuff CAS No. 99-88-7	Supplier Address		48	48	49.44	46.56	Diluent/balance
16. Typed Name of Approving Official Same as the person signing and dating the attachment.			17. Total Weight 100		100%			
18. Signature of Approving Official		19. Title		20. Phone No. (Include Area Code)		21. Date Same as date of attachment		

*Confidential Business Information: Does Not Contain National Security Information (E.O. 12065)*  
 This is a reproduction of EPA Form 8570-4 (Rev 8-94)

Form Approved. OMB No. 2070-0060. Approval expires 5-31

**CSF 8570-4 Example from 2012 CSF EP and MUP Memo**

## Notes for Box #2:

- Agency staff need the ability to verify a product is coming from an EPA Est. No. and has it approved on an EPA CSF and gets that from Box 2.
- If the product is an EP/MUP using a registered source, only a U.S. point of contact (with number) is required.
- For all unregistered source of MUP/EUP (along with data) the production address is required.

# Commodity Inert Website

- “Applicants for pesticide registration or registration amendments can obtain commodity inert ingredients from various commercial sources without having to provide EPA with the supplier's name and address”.
- Only those inert ingredients designated as commodity inert ingredients would be eligible for this reduced CSF reporting.
- When chemicals are used in a formulation as an active ingredient, the guidance on this slide, and on the commodity inert website, does not apply.
- *Examples:*

## Ethanol

Commodity Inert Ingredient Name	CAS Reg. No.
2-(2-Methoxyethoxy)ethanol	111-77-3
2-Butoxyethanol	111-76-2
Diethanolamine	111-42-2
Ethanol, 2-(hexyloxy)-	112-25-4
Ethanol, SDA 40-B	64-17-5
Ethanolamine	141-43-5
Triethanolamine	102-71-6

## EDTA

Commodity Inert Ingredient Name	CAS Reg. No.
Ethylenediaminetetraacetic acid (EDTA), sodium iron (III) salt	15708-41-5
Ethylenediaminetetraacetic acid (EDTA)	60-00-4
Ethylenediaminetetraacetic acid (EDTA) tetrasodium salt	64-02-8
Ethylenediaminetetraacetic acid (EDTA), calcium disodium salt	62-33-9
Ethylenediaminetetraacetic acid (EDTA), disodium manganese (II) salt	15375-84-5
Ethylenediaminetetraacetic acid (EDTA), disodium salt, dihydrate	6381-92-6

# Commodity Inert Website Continued

- **Trade Name Only used on CSF:**
  - If a trade name is provided for an ingredient in Column 10, the supplier's name and address must be given for that ingredient in Column 11.
  - All alternate sources must be listed in the Confidential Appendix.
- **Commodity name only used on CSF:**
  - If only a commodity is listed, the commodity name (and CAS#) must be put in Column 10. "Commodity Inert" must be in Column 11.
  - No alternate sources of the commodity should be added to the Confidential Appendix.
- **If a registrant chooses to display a Trade name and Commodity used on CSF:**
  - The commodity name (and CAS#) along with the supplier of the trade name ingredient must be listed in Column 10.
  - The supplier's name and address must be given for that ingredient in Column 11 along with the phrase "Commodity Inert".
  - Only alternate sources that have trade names should be added to the Confidential Appendix, along with the supplier's name and address.
  - No alternate sources of the commodity should be added to the Confidential Appendix.
  - Example:

<b>Lee 2-TW</b> Citric Acid CAS# 77-92-9	<b>Lee 2-TW Supplier Name</b> Lee 2-TW Supplier Address <b>Commodity Inert</b>
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# New Commodity Inerts

- Twelve new commodity inerts that were listed by CBC and HCPA as high priority for antimicrobial products were recently approved and added to the commodity inerts list website.
- New commodity inerts added in 2022 are:
  - Benzenesulfonic acid, C10-16-alkyl derivs (CAS Reg. No. 68584-22-5)
  - Boric acid (CAS Reg. No. 10043-35-3)
  - 2-Butoxyethanol (CAS Reg. No. 111-76-2)
  - Hydroxyacetic acid (CAS Reg. No. 79-14-1)
  - L-lactic acid (CAS Reg. No. 79-33-4)
  - d-Limonene (CAS Reg. No. 5989-27-5)
  - Propanol, 1(or 2)-(2-methoxymethylethoxy)- (CAS Reg. No. 34590-94-8)
  - Sodium dodecyl benzenesulfonate (CAS Reg. No. 25155-30-0)
  - Sodium carbonate (CAS Reg. No. 497-19-8)
  - Sodium xylene sulfonate (CAS Reg. No. 1300-72-7)
  - Sulfonic acids, C14-C16 alkane hydroxy and C14-C16 alkene, sodium salts (CAS Reg. No. 68439-57-6)
  - Trisodium phosphate (CAS Reg. No. 7601-54-9)

# Confidential Appendix Memos

- [Technical Grade Active Ingredient Memo](#) (2012)
  - *“The manufacturing process associated with the new site will result in the same impurity profile as the original manufacturing site listed on the original (basic or alternate) CSF.”*
- [End Use Product and Manufacturing Use Product Memo](#) (2012)
  - *“Instead of providing multiple, alternate CSFs reflecting each potential formula site...each potential country where production may occur...and each potential supplier of a specified inert ingredient...”*

## Note:

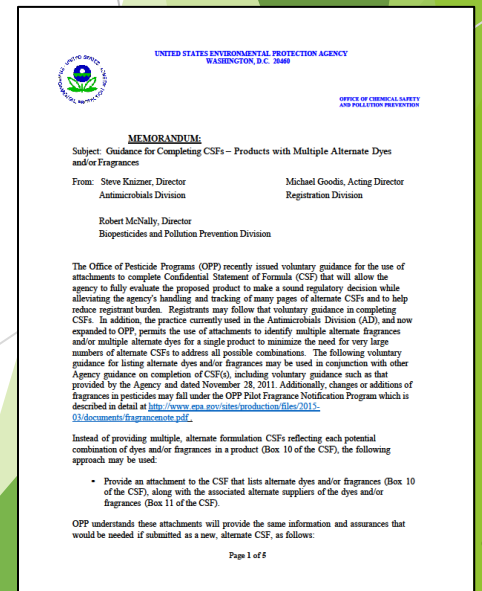
- *No “Frankenstein” Appendixes.*
- Formats of the Confidential Appendix must be followed as displayed.



# Dye and Fragrance Guidance

Follow guidance in [Fragrance Notification Pilot](#) from 2015 & the **Draft Fragrance and Dye Memo\*** dated 8/25/2016, and [Guideline 810.2000\(B\)\(7\)](#).

- All ingredients of a fragrance must be approved by the Agency before a notification or amendment can be submitted for that fragrance.
- The concentration of the dye and/or fragrance being added or changed must not exceed 1.0% (by weight) of the total pesticide product composition.
- Any change beyond 1% for dyes and/or fragrances is unacceptable as a non-PRIA change and would need to be submitted with confirmatory efficacy data.



\*For Draft Fragrance and Dye Memo, double click on image to open file.



# Dye and Fragrance Guidance Continued

**NOTE:** The fragrance list no longer exists.

- 1) Registrants must certify (see Attachment 1) that all fragrance component ingredients in the newly proposed fragrance are included on the Fragrance Ingredient List (FIL): <http://iaspub.epa.gov/apex/pesticides/f?p=101:1:>



[Inert Finder](#) website is the easiest to use

# Certified Limits

- [40 CFR § 158.350 Certified Limits](#) - The applicant must propose certified limits for the ingredients in the product. Certified limits become legally binding limits upon approval of the application. Certified limits will apply to the product from the date of production to date of use.

Standard Certified Limits		
If the nominal concentration (N) for the ingredient and percentage by weight for the ingredient is:	The certified limits for that ingredient will be as follows:	
	Upper Limit	Lower Limit
$N \leq 1.0\%$	$N + 10\%N$	$N - 10\%N$
$1.0\% \leq N \leq 20.0\%$	$N + 5\%N$	$N - 5\%N$
$20.0\% \leq N \leq 100.0\%$	$N + 3\%N$	$N - 3\%N$


- A justification for all ingredients with non-Standard Certified Limits must be given.
- The justification should be placed as footnote on the CSF or in the Confidential Appendix.
- Requested on CSF or in Confidential Appendix to expedite the review process for subsequent submissions.

# CSF Example #1 - Acceptable Format

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

Confidential Business Information: Does Not Contain National Security Information (E.O. 12065)

Form Approved. OMB No. 2070-0060. Approval expires 5-31-98

		United States <b>Environmental Protection Agency</b> Washington, DC 20460		A. <input checked="" type="checkbox"/> Basic Formulation <input type="checkbox"/> Alternative Formulation		B. Page 1 of 3		See Instructions on Back			
<b>Office of Pesticide Programs (7505C) – Confidential Statement of Formula</b>											
1. Name and Address of Applicant/Registrant (Include ZIP Code)				2. Name and Address of Producer (Include ZIP Code)							
3. Product Name Pesticide EP				4. Registration No./File Symbol 9999-99		5. EPA Product Mgr/Team No.		6. Country Where Formulated			
				7. Pounds/Gal or Bulk Density XX		8. pH XX		9. Flash Point/Flame Extension XX			
EPA USE ONLY	10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number)		11. Supplier Name and Address		12. EPA Reg No.		13. Each Component in Formulation		14. Certified Limits % by Weight		15. Purpose in Formulation
							a. Amount (lb)      b. % by weight		a. Upper Limit      b. Lower Limit		
	Active ingredient Cas purity		Company abc Street City, state, zip		9999-99		25      25.0 (12.5)		(12.88)      (12.12)		Active ingredient
	Surfactant CAS		Company E 11 Elm Street Town, ST, USA 54321				26.5      26.5		27.30      25.70		Surfactant
	Trade Name Fragrance		Supplier Address				0.5      0.5		0.55      0.45		Fragrance
	Trade Name Dye		Supplier Address				1.95      1.95		2.05      1.85		Colorant
	Water		Local source				46.5      46.5		47.9      45.10		Diluent/ balance
16. Typed Name of Approving Official							17. Total Weight		100%		
							100				
18. Signature of Approving Official			19. Title			20. Phone No. (Include Area Code)			21. Date		

This is a reproduction of EPA Form 8570-4 (Rev 8-94)

# Confidential Appendixes #1 Acceptable Format

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

CONFIDENTIAL BUSINESS INFORMATION – Example ABC Company

ATTACHMENT [A] – ALTERNATE LIST  
TO [DATE must match associated CSF and signature below]  
CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]  
Page 2 of 3

**PESTICIDE END PRODUCT**  
EPA REGISTRATION NUMBER: 00000-99

Basic  Alternate

**CSF BOX 2** (Please note that registrants may provide name and address of appropriate company contact for production-related questions (i.e., party responsible for production) in lieu of or in addition to the following table)

Name and Address of Additional Producer(s)	EPA Establishment Number
Contact Name, Title, Phone Number Company Name and Address: Pete's Example Site 12345 Example Lane Anytown, Anystate Zip, USA	00000-AS-1
Contact Name, Title, Phone Number Company Name and Address: Pete's Sample Location 23456 Sample Court Anytown, Anystate Zip, USA	00000-AS-3
Contact Name, Title, Phone Number Company Name and Address: Pete's NEW Location 34567 New Street Anytown, Mexico	00000-Mexico-4
Contact Name, Title, Phone Number Company Name and Address: Pete's Sample Site 34567 Exotic Ave. Downtown, Australia	00000-Australia- 5

**CSF BOX 6**

Alternate Country(ies) Where Formulated
Mexico, Australia

\_\_\_\_\_  
Typed Name and Title of Registrant  
Approving Official

\_\_\_\_\_  
Signature of Registrant Approving  
Official

\_\_\_\_\_  
Date [must match associated CSF]

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

CONFIDENTIAL BUSINESS INFORMATION – Example ABC Company

ATTACHMENT [A] – ALTERNATE LIST  
TO [DATE must match associated CSF and signature below]  
CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]

Page 3 of 3

**PESTICIDE END PRODUCT**  
EPA REGISTRATION NUMBER: 00000-99

Basic  Alternate

**CSF Box 11**

Alternate Supplier List

Ingredient: Everyday Chem® ABC

CAS No.: 1234-56-7

Common Trade Name: chemical ABC

Supplier	Address
West Coast Ltd.	Downtown, Australia
Generis Distributors	Anytown, Mexico

Ingredient: Best Stuff®

CAS No.: Proprietary

Supplier	Trade Name	Address
AB Manufacturing	Best Stuff AU®	Downtown, Australia
ALVO Distribution	Mejores Coses®	Anytown, Mexico

Ingredient: Common stuff

CAS No.: 99-88-7

Common Trade Name: stuff

Supplier	Address
Westman Chemical	Anytown, Anystate USA
Southside Supply	Anytown, Anystate USA
Outback Ltd.	Downtown, Australia

\_\_\_\_\_  
Typed Name and Title of Registrant  
Approving Official

\_\_\_\_\_  
Signature of Registrant Approving  
Official

\_\_\_\_\_  
Date [must match associated CSF]

# Confidential Appendixes #2 Acceptable Format

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

CONFIDENTIAL BUSINESS INFORMATION – Example ABC Company  
ATTACHMENT A – ALTERNATE LIST  
EPA REG. NO. 9999-99  
BASIC FORMULATION DATED xxxx [Date must match associated CSF and signature below]  
Pesticide EP  
Page 2 of 3

CSF Box 10 and 11  
Alternate Ingredient and Supplier List - FRAGRANCE

1. List of Fragrance Suppliers

Any of the following:

Fragrance House A, 123 Street, Anytown, USA  
Fresh Lemon #111  
Mint #222  
Fresh #333  
Soap #444  
Floral #555  
Rose Floral #666  
Sassafras #777  
Lemon #888  
Lemon #999  
Lemon #111A  
Lemon #111B  
Fresh #333A  
Fresh #333B  
Lemon #111C

Fragrance House B, 456 Avenue, Anycity, USA  
111-LIME  
222-LAVENDER  
333-PINE  
444-PEPPERMINT  
666-CITRUS

\_\_\_\_\_  
Typed Name of Registrant Approving Official

\_\_\_\_\_  
Signed Name of Registrant Approving Official

\_\_\_\_\_  
Date

Attachments to [date] EPA Memorandum  
Example documents; do not contain Confidential Business Information

CONFIDENTIAL BUSINESS INFORMATION – Example ABC Company  
ATTACHMENT A – ALTERNATE LIST  
EPA REG. NO. 9999-99  
BASIC FORMULATION DATED xxxx [Date must match associated CSF and signature below]  
Pesticide EP  
Page 3 of 3

CSF Box 10 and 11  
Alternate Ingredient and Supplier List – DYE

List of Dye Suppliers

Any one or combination of two or more of the following

Dye Company A, 123 Street, City, US  
Brilliant Red 1A  
Blue 2A  
Blue 3A  
Black 4A  
  
Dye Company B, 245 Street, Town,  
US Red 1B  
Brilliant Orange 2B  
Bright Yellow 3B

Dye Company C, 321 Avenue, City, US  
Yellow 1C  
Orange 2C (D&C Orange #4)  
Forest Green 3C  
Grass Green 4C  
Blue 5C  
Acid Green #1  
Blue 6C  
Opalescent Green 7C  
Deep Red 8C (D&C Red #33)  
Scarlet 9C  
Acid Red 10C  
Bright Yellow (D&C Yellow #8)  
Yellow 11C

Dye Company D, 789 Avenue, Town,  
US D&C Green 5, CAS# 4403-90-1


\_\_\_\_\_  
Typed Name of Registrant Approving Official

\_\_\_\_\_  
Signed Name of Registrant Approving Official

\_\_\_\_\_  
Date

# CSF Example #2 - Acceptable Format

Confidential Business Information: Does Not Contain National Security Information (E.O. 12065) Form Approved. OMB No. 2070-0060. Approval expires 2-28-95.

 <p>United States <b>Environmental Protection Agency</b> Washington, DC 20460</p>		A. <input checked="" type="checkbox"/> Basic Formulation <input type="checkbox"/> Alternate Formulation		B.  Page 1 of 3		See Instructions on Back					
<b>Office of Pesticide Programs (7505C) – Confidential Statement of Formula</b>											
1. Name and Address of Applicant/Registrant (Include Zip Code)				2. Name and Address of Producer (Include Zip Code)							
Company Name Company Address				Producer Name Producer Address							
3. Product Name  <i>Product Name</i>				4. Registration No./File Symbol XXXXXX-XX		5. EPA Product Mgr./Team No. PM Name/ Team XX		6. Country Where Formulated USA			
				7. Pounds/Gal. or Bulk Density X.XXX lb/gal		8. pH X.X		9. Flash Point/Flame Extension XX C			
EPA USE ONLY	10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number.)			11. Supplier Name & Address		12. EPA Reg. No.	13. Each Component In Formulation		14. Certified Limits % by Weight		15. Purpose In Formulation
	Active Ingredient #1 [50%]			Supplier Name Supplier Address		XXXXX-X	a. Amount (lbs.) 10,800	b. % by weight 24.0 [12.0]	a. Upper limit 25.2 [12.6]	b. Lower limit 22.8 [11.4]	Active
	Active Ingredient #2 [80%]			Supplier Name Supplier Address		XXXX-XX	1,406	3.1 [2.5]	3.3 [2.7]	2.9 [2.3]	Active
	Lee 2-TW Citric Acid CAS# 77-92-9			Lee 2-TW Supplier Name Lee 2-TW Supplier Address Commodity Inert			90	0.2	0.22	0.18	pH Buffer
	Methanol CAS# 67-56-1			Supplier Name Supplier Address			15,750	35.0	36.1	34.0	Diluent
	Water CAS# 7732-18-5			Local Sources			16,954	37.7	38.8	36.6	Diluent
16. Typed Name of Approving Official							17. Total Weight 45,000	100.00			
18. Signature of Approving Official				Example documents; do not contain Confidential Business Information				21. Date XXXXX XX, 2022			

EPA Form 8570-4 (Rev.8-94 Previous editions are obsolete.)



# CSF Example #2 - Acceptable Format Continued

Attachments to September 11, 2012 EPA Memorandum  
 CONFIDENTIAL BUSINESS INFORMATION – Company Name  
 ATTACHMENT [A] - ALTERNATE LIST  
 TO XXXX XX, 2022 CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]  
 Page 2 of 3  
 PESTICIDE END PRODUCT  
 EPA REGISTRATION NUMBER: XXXXXX-XX  
 Basic  Alternate

CSF Box 11  
 Alternate Supplier List

Active Ingredient #1 [50%]  
 CAS No.: XXX-XX-X  
 Common Trade Name: XXXXXXXXX

Alternate Ingredient	Supplier	Address
A.I. #1 Product Name A EPA Reg. No. XXXXX-XX [50%]	Supplier A	Address A
A.I. #1 Product Name B EPA Reg. No. XXXXX-XX [50%]	Supplier B	Address B

Active Ingredient #2 [80%]  
 CAS No.: XXX-XX-X  
 Common Trade Name: XXXXXXXXX

Alternate Ingredient	Supplier	Address
A.I. #2 Product Name A [80%] EPA Reg. No. XXXXX-XX	Supplier A	Address A
A.I. #2 Product Name B [80%] EPA Reg. No. XXXXX-XX	Supplier B	Address B
A.I. #2 Product Name C [80%] EPA Reg. No. XXXXX-XX	Supplier C	Address C
A.I. #2 Product Name D [80%] EPA Reg. No. XXXXX-XX	Supplier D	Address D
A.I. #2 Product Name E [80%] EPA Reg. No. XXXXX-XX	Supplier E	Address E

Example documents; do not contain Confidential Business Information

Typed Name and Title of Registrant Approving Official  
 \_\_\_\_\_  
 Signature of Registrant Approving Official  
 \_\_\_\_\_  
 XXXXX XX, 2022  
 \_\_\_\_\_  
 Date

Attachments to September 11, 2012 EPA Memorandum  
 CONFIDENTIAL BUSINESS INFORMATION – Company Name  
 ATTACHMENT [A] - ALTERNATE LIST  
 TO XXXX XX, 2022 CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]  
 Page 3 of 3  
 PESTICIDE END PRODUCT  
 EPA REGISTRATION NUMBER: XXXXXX-XX  
 Basic  Alternate

CSF Box 11  
 Alternate Supplier List

Basic Ingredient: Methanol  
 CAS No.: 67-56-1  
 Common Trade Name: methanol


Supplier	Address
Supplier #1	Address #1
Supplier #2	Address #2
Supplier #3	Address #3
Supplier #4	Address #4
Supplier #5	Address #5

Example documents; do not contain Confidential Business Information

Typed Name and Title of Registrant Approving Official  
 \_\_\_\_\_  
 Signature of Registrant Approving Official  
 \_\_\_\_\_  
 XXXXX XX, 2022  
 \_\_\_\_\_  
 Date



# CSF Example #3 - Improper Format

 <b>EPA</b> United States Environmental Protection Agency Washington, DC 20460		A. <input checked="" type="checkbox"/> Basic Formulation <input type="checkbox"/> Alternate Formulation		B. Page 1 of 3		See Instructions on Back				
Confidential Business Information: Does Not Contain National Security Information (E.O. 12065) <span style="float: right;">Form Approved OMB No. 2070-00600. Approval expires 2-28-95</span>										
Office of Pesticide Programs (7505C) - Confidential Statement of Formula										
1. Name and Address of Applicant/Registrant (Include ZIP Code) <b>Company Name</b> <b>Company Address</b>				2. Name and Address of Producer (Include ZIP Code) <b>See Attachment</b>						
3. Product Name <b>Product Name</b>				4. Registration No./File Symbol <b>XXXXXX-XX</b>		5. EPA Product Manager/Team No. <b>PM Name/ Team XX</b>		6. Country Where Formulated <b>USA</b>		
				7. Pounds/Gal or Bulk Density <b>0.XXX g/mL</b>		8. pH <b>X.XX</b>		9. Flash Point/Flame Extension <b>XX°C (XXX°F)</b>		
EPA USE ONLY		10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number.)		11. Supplier Name & Address	12. EPA Reg. No.	13. Each Component in Formulation		14. Certified Limits % by Weight		15. Purpose in Formulation
		<b>See Attachment For Trade names</b> Ingredient Name 80%  CAS # XXXXX-XXX		<b>See Attachment for Suppliers</b>	<b>See Attachment For EPA Reg. Nos.</b>	a. Amount 625.0 kg	b. % by weight 62.5 (50.0)	a. Upper Limit 64.38 (51.5)	b. Lower Limit 60.6 (48.5)	Source Antimicrobial/Biocide
		Water  CASRN 7732-18-5		Local Source	Not Applicable	375.0 kg	37.5	38.62	36.74	Diluent
		Dye		<b>See Attachment for Suppliers</b>	Not Applicable	0.05 kg	0.005	0.1*	0.001*	Colorant
*NOTE TO REVIEWER: For the dye, we are requesting certified limits that are wider than EPA standards to allow for product customization among supplemental distributors. As shown the amount of dye will not exceed 0.1% (by weight) of the total product.										
						17. Total Weight <b>1000.0 kg</b>		100%		
17. Signature of Approving Official  Example documents; do not contain Confidential Business Information				19. Title:				21. Date XXXX XX, 2022		

# CSF Example #3 - Improper Format Continued

Confidential Business Information: Does Not Contain National Security Information (E.O. 12065) Form Approved OMB No. 2070-00600. Approval expires 2-28-95

United States  
**EPA** Environmental Protection Agency  
 Washington, DC 20460

A.  Basic Formulation  
 Alternate Formulation

B. Page 2 of 3 See Instructions on Back

Office of Pesticide Programs (7505C) - Confidential Statement of Formula

1. Name and Address of Applicant/Registrant (Include ZIP Code)  
 Company Name  
 Company 22202

2. Name and Address of Producer (Include ZIP Code)  
 See Attachment

3. Product Name  
 Product Name

4. Registration No./File Symbol  
 XXXXXX-XX

5. EPA Product Manager/Team No.  
 PM Name/ Team XX

6. Country Where Formulated  
 USA

7. Pounds/Gal or Bulk Density  
 0.XXX g/mL

8. pH  
 X.XX

9. Flash Point/Flame Extension  
 XX°C (XXX°F)

EPA USE ONLY 10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number.)

11. Supplier Name & Address

12. EPA Reg. No.

13. Each Component in Formulation  
 a. Amount b. % by weight

14. Certified Limits % by Weight  
 a. Upper Limit b. Lower Limit

15. Purpose in Formulation

CONFIDENTIAL BUSINESS INFORMATION  
 ATTACHMENT A - ALTERNATE LIST  
 TO XX/XX/2021  
 CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]  
 Page 2 of 3  
 Product Name  
 EPA REGISTRATION NUMBER: XXXXX-XX  
 Basic  Alternate

2. Name and Address of Producer (Include ZIP Code)

Name	Address	EPA Est. No.
Name 1	Name and Address 1	XXXXXX-GA-1
Name 2	Name and Address 2	XXXXXX-IL-1

Alkyl (C14 50%, C12 40%, C16 10%) dimethyl benzyl ammonium chloride, 80%

Boxes 10, 11, and 12: Alternates for Components in Formulation, Supplier Name & Address, and EPA Reg. No.

10 Brand Name	11 Supplier Name & Address	12 EPA Reg. No.
Name 1	Name and Address 1	XXXXXX-X**
Name 2	Name and Address 2	XXXXXX-X
Name 3	Name and Address 3	XXXXXX-X
Name 4	Name and Address 4	XXXXXX-X

\*\* This may be supplied as Product Name (EPA Reg. No. XXXXXX-X-XXXXX) from Company Name and Address

17. Signature of Approving Official	19. Title: Example documents; do not contain Confidential Business Information	21. Date XXXX XX, 2022
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Confidential Business Information: Does Not Contain National Security Information (E.O. 12065) Form Approved OMB No. 2070-00600. Approval expires 2-28-95

United States  
**EPA** Environmental Protection Agency  
 Washington, DC 20460

A.  Basic Formulation  
 Alternate Formulation

B. Page 3 of 3 See Instructions on Back

Office of Pesticide Programs (7505C) - Confidential Statement of Formula

1. Name and Address of Applicant/Registrant (Include ZIP Code)  
 Company Name  
 Company

2. Name and Address of Producer (Include ZIP Code)  
 See Attachment

3. Product Name  
 Product Name

4. Registration No./File Symbol  
 XXXXXX-XX

5. EPA Product Manager/Team No.  
 PM Name/ Team XX

6. Country Where Formulated  
 USA

7. Pounds/Gal or Bulk Density  
 0.XXX g/mL

8. pH  
 X.XX

9. Flash Point/Flame Extension  
 XX°C (XXX°F)

EPA USE ONLY 10. Components in Formulation (List as actually introduced into the formulation. Give commonly accepted chemical name, trade name, and CAS number.)

11. Supplier Name & Address

12. EPA Reg. No.

13. Each Component in Formulation  
 a. Amount b. % by weight

14. Certified Limits % by Weight  
 a. Upper Limit b. Lower Limit

15. Purpose in Formulation

CONFIDENTIAL BUSINESS INFORMATION  
 ATTACHMENT A - ALTERNATE LIST  
 TO XX/XX/2021  
 CONFIDENTIAL STATEMENT OF FORMULA [EPA Form 8570-4]  
 Page 3 of 3  
 Product Name  
 EPA REGISTRATION NUMBER: XXXXX-XX  
 Basic  Alternate

Dye  
 Boxes 10, 11, and 12: Alternates for Components in Formulation, Supplier Name & Address, and EPA Reg. No.

10. Approved Dye List	11. Supplier Name & Address	CASRN
Dye #1	Supplier #1 Name & Address	XXXX-XX-X
Dye #1	Supplier #2 Name & Address	XXXX-XX-X
FD&C Blue #1	Supplier #1 Name & Address	XXXX-XX-X
FD&C Blue #1	Supplier #2 Name & Address	XXXX-XX-X
FD&C Blue #1	Supplier #3 Name & Address	XXXX-XX-X
FD&C Blue #1	Supplier #4 Name & Address	XXXX-XX-X
FD&C Blue #1	Supplier #5 Name & Address	XXXX-XX-X
FD&C Blue #2	Supplier #1 Name & Address	XXXX-XX-X
FD&C Blue #2	Supplier #2 Name & Address	XXXX-XX-X
FD&C Blue #2	Supplier #3 Name & Address	XXXX-XX-X
FD&C Blue #2	Supplier #4 Name & Address	XXXX-XX-X
FD&C Blue #2	Supplier #5 Name & Address	XXXX-XX-X
Dye #3	Supplier #1 Name & Address	XXXX-XX-X

17. Signature of Approving Official	19. Title: Example documents; do not contain Confidential Business Information	21. Date XXXX XX, 2022
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# CSF Resource List

- [Technical Grade Active Ingredient Memo](#)
- [End Use Product Memo and Manufacturing Use Product Memo](#)
- [Certified Limits](#)
- [Guideline 810.2000\(B\)\(7\)](#)
- [Fragrance Notification Pilot](#)
- [Series 810 Guidelines FAQ](#)
- [Commodity Inert website](#)
- [Pesticide Chemical Search website](#)
- [Inert Finder Website](#)
- [Inert FAQ](#)
- [EPA PRN 98-10](#)

# Who to contact if you have questions

- Product specific questions should be directed to the Product Manager for the pending or registered product.
- For up-to-date contact information, please visit the Antimicrobial Division Contacts website. <https://www.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobials-division>
- General questions can be sent to Shanta Adeeb at [adeeb.shanta@epa.gov](mailto:adeeb.shanta@epa.gov).