Merck KGaA

**Biocidal active substance:** IR3535®

Document IIIA, Section A5

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April 2006 amended May 2010 amended October 2013

Secti	on A2	Identity of A	Active Substance			
Subs (Anno	section ex Point)					Official use only
2.1	Common name (IIA2.1)	IR3535 <sup>®</sup> , Ethy	l butylacetylaminopro	pionate		
2.2	Chemical name (IIA2.2)	Ethyl 3-[N-ace beta-alanine, N	tyl-N-butyl] amino pr N-acetyl-N-butyl-, ethy	opionate (IUP. 1 ester (CA)	AC)	x
2.3	Manufacturer's development code number(s) (IIA2.3)	IR3535®				
2.4	CAS No and EC numbers (IIA2.4)					
2.4.1	CAS-No	52304-36-6				
	Isomer 1	No isomers				
	Isomer n					
2.4.2	EC-No	257-835-0				
	Isomer 1	No isomers				
	Isomer n					
2.4.3	Other	CIPAC No.: 60	67			
2.5	Molecular and structural formula, molecular mass (IIA2.5)					
2.5.1	Molecular formula	C11H21NO3				
2.5.2	Structural formula	~~~~ C		o~		
2.5.3	Molecular mass	215.29 g/mol				
2.6	Method of manufacture of the active substance (IIA2.1)	See confidential version of this document.				
2.7	Specification of the	g/kg	g/1	% w/w	% v/v	
	purity of the active substance, as	<u>≥ 990</u>	not applicable	<u>&gt; 99</u>	not applicable	

#### Identity of Active Substance

## Merck KGaA

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## Section A2 Identity of Active Substance

2.8	Identity of impurities and additives, as appropriate (IIA2.8)	see separate standard format
2.8.1	Isomeric composition	No isomers
2.9	The origin of the natural active	Synthetic product

natural active	
substance or the	
precursor(s) of the	
active substance	
(IIA2.9)	
	natural active substance or the precursor(s) of the active substance (IIA2.9)

	Evaluation by Competent Authorities
	Identity of Active Substance
	EVALUATION BY RAPPORTEUR MEMBER STATE
Date	
Materials and methods	
Conclusion	
Reliability	
Acceptability	
Remarks	
	COMMENTS FROM .RMS AFTER THE TM
Date	November 2010
Results and discussion	
Conclusion	the correct IUPAC-name for the active substance is Ethyl 3-[N-acetyl-N-butyl] amino propionate
Reliability	The second second second second
Acceptability	
Remarks	

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		amended Ma				
			10001 2012			
Section	n A2.8	Identity of impurities and additives (active substance)				
Annex I	Point IIA2.8	fill in one form for each impurity/additive				
		See confidential version of this document.				
Section Annex I	n A2.10 Point IIA2.10	Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, p. 1) amending Council Directive 67/548/EEC				
Subse	ction		Official use only			
2.10.1	Human exposure towards active substance					
2.10.1.1	Production					
	i) Description of process	See confidential version of this document.				
	ii) Workplace description	The whole reaction process (including loading of raw materials) is carried out in a closed device. All substance related occupational limit concentrations are far below critical data defined by legal regulations (MAK1 / TRK2 values). Potential human exposure is only possible during loading and cleaning/service processes. All handling with respect to these processes are carried out using personal protection measures, which are related to the respective task (up to full personal protection for special cleaning and service tasks).				
		1 MAK = maximum workplace concentration according to German legislation				
		2 TRK = technical exposure limit				
	iii) Inhalation exposure	See ii) Workplace description				
	iv) Dermal exposure	See ii) Workplace description				
2.10.1.2	2 Production of the formulated product	The formulated product is a model formulation therefore exposure data have not been provided. Production in extremely small amounts for study purposes. However, in modern formulation plants typically automated equipment is used to add the formulation ingredients and to fill the formulated product into the respective vessels (closed systems). The workers (trained professionals) usually wear personal protective equipment (e.g. gloves). The exposure during the formulation task should be negligible.				

Merck KGaA **Biocidal active substance:** Page 4-6 IR3535® Document IIIA, Section A5 April 2006 amended May 2010 amended October 2013 Section A2.10 Exposure data in conformity with Annex VIIA to Council Directive 92/32/EEC (OJ No L, 05.06.1992, Annex Point IIA2.10 p. 1) amending Council Directive 67/548/EEC 2.10.1.3 Intended use(s) For details please refer to Document IIB, Chapter 3 1. Professional Users Not relevant 2. Non-professional users (general public) via inhalational contact For details please refer to document II B Chapter 3. via skin contact For details please refer to document II B Chapter 3 3. Secondary exposure inhalation of volatilized For details please refer to document II B Chapter 3 residues 4. indirect via environment Not relevant. Active substance is not expected to be found in drinking water. For via drinking water details please refer to document II B Chapter 3. via food Active substance is not intended to be used during food production, food processing and in areas where food is transported and, stored. This is also the case for feeding stuffs. Thus, humans are not expected to be exposed to Active substance via food. 2.10.2 Environmental exposure towards active substance 2.10.2.1 Production In the Insect Repellent 3535® process several washes with brine (i) Releases into water (water plus salts) is performed. The water phase is transferred to the Biological Waste Water Treatment Plant, Waste water: (average per working day). The maximum concentration of Insect Repellent 3535® in waste water before being bio-treated is less than 10 ppm. (ii) Releases into air The product is purified by distillation under vacuum. Distillation devices are equipped with brine traps at -15°C to avoid release of volatile compounds to the air. The release of organic compounds during the production process to . It is supposed that these are exhaust air is around mostly volatile compounds. Organic liquid waste is collected and delivered to approved third (iii) Waste disposal parties for incineration.

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# Section A2.10Exposure data in conformity with Annex VIIA to<br/>Council Directive 92/32/EEC (OJ No L, 05.06.1992,<br/>p. 1) amending Council Directive 67/548/EEC

#### 2.10.2.2 Intended use(s)

For details please refer to Document IIB, Chapter 3.				
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	Evaluation by Competent Authorities		
Data	Evaluation by Rapporteur Member State		
Date			
Materials and methods			
Conclusion	Adopt applicant's version including revised parts		
Reliability			
Acceptability acceptable.			
Remarks	1		
	COMMENTS FROM		
Date	Give date of comments submitted		
Results and discussion	Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state		
Conclusion	Discuss if deviating from view of rapporteur member state		
Reliability	Discuss if deviating from view of rapporteur member state		
Acceptability	Discuss if deviating from view of rapporteur member state		
Remarks			

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Table A2.10:	Workplace exposure	e / Inhalation exposur	e (use addtional to	erminology fi	rom the TNsGs o	on Human exposure
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Exposure scenario	Workplace operation	РРЕ	Year(s) of measurement	Number of measurements	Type of measurements	Exposure concentration
Production <sup>1)</sup>	Emptying, filling, weighing	Gloves			personal, TWA	
Formulation <sup>1)</sup>	Cleaning	Protective coverall			area, short-term	
Application MG/PT <sup>2)</sup>	Brushing	Gloves, goggles				

1) All substances related to occupational limit concentrations are far below critical data defined by legal regulations.

Human exposure to IR3535<sup>®</sup> during application of products containing IR3535<sup>®</sup> was assessed according to the TNsG on human Exposure. For details please refer to Document IIA, Chapter 8.2.