BPPD CSF REVIEW CHECKLIST CHECKLIST VERSION: October 2023

EPA Reg. No./File Symbol:

Case Number:

Application Date:

CSF(s) Date:

	General Application Review	Yes	No	N/A
1.*	Are sections I, II, and IV of the application form (EPA Form 8570-1) complete? Section III, while often left blank, may impact language on the label and CSF.			
2.*	**Notifications** - Did the applicant include the required certification statement with the submission?			
3.*	**Notifications** - Did the applicant submit a "clearly marked" copy of all modified Confidential Statements of Formula (CSFs - EPA Form 8570-4)?			
4.**	**Notifications** - Are ALL of the requested changes to the CSF covered by PR Notice 98-10? If NO, note section(s) for use in "unacceptable" letter:			

	CSF Review	Yes	No	N/A
1.**	Are all submitted CSFs complete and acceptable?			
a.	Are boxes 1-9 filled out correctly?			
b.	In column 10, for each component, are the chemical name, trade name (if applicable), and CAS Number(s) listed? For microbial active ingredients: Viability (e.g., CFU/g) and culture collection ID (e.g., ATCC 889-34) must also be included. Culture collection ID not required on EP CSF with a registered MP because culture collection ID should be on MP CSF.			
i.	If a trade name is listed, is the trade name recognized/cleared by EPA? EPA Trade Name Database			
ii.	For products with food uses, do all ingredients have the appropriate clearances? Use the inert finder or OPPIN			
iii.	In the "EPA USE ONLY" column (to the left of column 10), enter the PC Code, and for products with food uses, the 40 CFR citation for each component. Note: If PC Code is not in OPPIN, EPA will request its creation.			

	CSF Review	Yes	No	N/A
c.	Are columns 11-15 filled out?			
i.	In column 11, if the source of the active ingredient is changing, is the new source for active ingredient (AI) a registered pesticide and are the formulations of these manufacturing-use products acceptably similar?			
ii.	If registrant is using a registered source active ingredient from a different company, was a Formulators Exemption (EPA Form 5870-27) form filled out completely and signed?			
iii.	In column 13, do ingredients and their proportions accord with label's ingredient statement? Are the significant figures correct and do the values in column 13b sum to 100%?			
iv.	In column 14, are certified limits acceptable (i.e., agree with 40 CFR 158.350, match past approved CSFs, or have acceptable justification on record)?			
d.	Is the calculation for box 17 (totals of column 13) accurate?			
e.	Are boxes 16, 18-21 (e.g., signature and date) filled out correctly?			
2.*	If CSFs list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacean, or wheat commodities, do use directions comply with 40 CFR 180.1071?			
3.**	If label makes any National Organic Program (NOP - PR Notice 2003-1) or OMRI claims (or if the product is an MP with EPs that make organic claims), are all ingredients NOP compliant?			
4.	Other comments:			

*Deficiencies that may be remedied.
**Deficiencies that can lead to rejection.

Case Completion Process

1. Follow "e-Process" SOP (prepare letter for signature), assign task for signature, and after receiving signed letter, follow "close-out" SOP (close-out in SF, transmit/file letter, file current CSF as explained below, etc.).
2. In the product files, edit the document title of the superseded CSF(s) in Salesforce to included "SUPERSEDED" at the beginning (e.g., "SUPERSEDED 84059-28 Basic CSF_10-11-2009_ Accepted 11-11-2009") and upload new, annotated CSF(s) using the naming convention: REG#-Basic/Alt 1/Etc-DateInBox21-DateAccepted (e.g., "84059-28 Basic CSF_08-31-2020_Accepted 04-31-2021").

When to get help from RAB regarding non-PRIA CSF amendments

When to Review CSF Yourself	When to Send a Review Task to RAB (or at least consider checking with RAB)
1. Addition of alternate supplier of inert 2. Addition of additional source of active ingredient (registered) 3. Addition of additional establishment number for end-use/manufacturing-use products formulated with registered source of active ingredient 4. Change in formulation that doesn't delete or add any new inerts and still keeps everything within the certified limits 5. Name change of the company or change in the contact person/contact number of the company 6. Product name change	1. Addition of unregistered source of active ingredient (should be submitted via PRIA action) 2. Addition of new production location for TGAI (should be submitted via PRIA action) 3. Addition of new production location for end-use products formulated with unregistered source of active ingredient (should be submitted via PRIA action) 4. Any change that includes justification for wider certified limits 5. Any formulation change that deletes one of the inerts from the basic CSF altogether 6. Any formulation change that adds an entirely new inert 7. If you see changes in the physical-chemical properties (Box Nos. 7, 8 & 9) 8. AI is produced by chemical reaction (e.g., formation of salts or esters – integrated process) 9. Any new impurity in the technical product 10. In the event any efficacy data may be impacted by proposed change(s) to the CSF

Additional Guidance: Herndon Memos, TGAIs, EPs and MPs