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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM OF CONFERENCE

SUBJECT: Dicofol -Rohm & Haas

FROM: Susan V. Hummel, Chemist
Special Registration Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Branch Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Files

Susan V. Hummel
[Signature]

Meeting of July 21, 1986

Attendees: Robert Larkin, Rohm and Haas
Patrick McNulty, Rohm and Haas
Susan Hummel, RCB
Larry Schnaubelt, PM#12

Rohm and Haas requested a meeting to discuss the unidentified part of their dicofol containing <2.5% DDT-r and <0.1% DDT-r.

Dr. Larkin submitted a new Confidential Statement of Formula for Rohm and Haas dicofol products to Larry Schnaubelt at this meeting and stated that the balance of the Product Chemistry data would be submitted in about a month. I stated that the Confidential Formula could not be reviewed without the balance of the Product Chemistry data. These data, required by the Registration Standard, have remained outstanding data gaps since the publication of the Registration Standard, December 30, 1983. We have reiterated these data gaps in each of our Product Chemistry reviews (S. Hummel, 7/30/85, 4/9/85, 3/20/85, and 3/15/85). The major data gaps outstanding are the large percentage of unidentified components in the technical and the lack of a validated analytical method to analyze the technical. There is also a minor deficiency in the description of the manufacturing process.

Dr. McNulty stated that Rohm and Haas made no attempt to identify these unidentified components in their technical until approximately one year ago. Further discussion of these impurities is found in the Confidential Appendix.

Rohm and Haas said they hoped that their competitors were being held to the same standards they were being held to. I said, "yes."

I asked if Rohm and Haas had any intrastate products containing dicofol. They said there were intrastate products in AL, GA, MS, and several in CA for corn.

Attachment: Confidential Appendix (Attached to copies to R.F., S. Hummel, dicofol S.R.F., dicofol Reg. Std. File, B. Kapner (SRB/RD), PM#12, K. Barbehenn (SIS), R. Hitch (EAB), M. Rostker, (EEB), TOX, PMSD/ISB)

cc: R.F., circu, S. Hummel, dicofol S.F., dicofol S.R.F., dicofol Reg. Std. File, B. Kapner (SRB/RD), K. Barbehenn (SIS), R. Hitch (EAB), M. Rostker (EEB), TOX, PMSD/ISB
M. Slimak (EEB), J. Reinert (EAB), PM#12, John Melone (HED)
RDI:EZ:7/29/86
TS-769:RCB:SVH:svh:RM810:CM#2:7/31/86

Dicofol residue chemistry reviews

Page 3 is not included in this copy.

Pages _____ through _____ are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients
 - Identity of product impurities
 - Description of the product manufacturing process
 - Description of product quality control procedures
 - Identity of the source of product ingredients
 - Sales or other commercial/financial information
 - A draft product label
 - The product confidential statement of formula
 - Information about a pending registration action
 - FIFRA registration data
 - The document is a duplicate of page(s) _____
 - The document is not responsive to the request
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
