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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 19 1986

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT Dicofol - Review of the Rohm & Haas Submission
in Response to the "Dicofol Notice of Intent
to Cancel".

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

THRU Charles L. Trichilo Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (ST-769)

TO: L. Schnaubelt, PM #12
Insecticide Rodenticide Branch
Registration Division (TS-767)

Susan V. Hummel

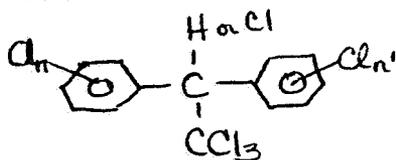
[Signature]

Residue Chemistry Branch has recently completed review of the Rohm and Haas submission in response to the dicofol Notice of Intent to Cancel (NOIC). Rohm and Haas has not complied with the NOIC, which required a certified limit of 2.5% DDT-r or less, in dicofol technical.

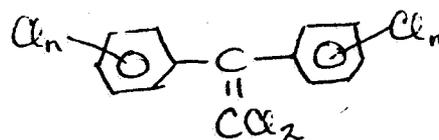
The composition of Rohm and Haas dicofol technical is discussed in the Confidential Appendix to this memo.

I am providing additional information relevant to the cancellation or suspension of Rohm and Haas dicofol technical for failure to comply with the NOIC.

Rohm and Haas does not agree with the Agency's interpretation of DDT-r, and asserts that DDT-r is comprised solely of the eight isomers specifically listed in the NOIC. At a minimum, RCB considers any chlorinated 1,1-bisphenyl-ethane or -ethylene to be structurally related to DDT and therefore included in the definition of DDT-r. Examples of these structures are shown below.



DDT or Cl-DDT analog



DDE analog

INFORMATION WHICH MAY REVEAL A MANUFACTURING PROCESS IS NOT INCLUDED

Based on the Rohm and Haas analytical results and re-consideration of data from Makhteshim Co., RCB cannot be certain that Makhteshim Co. does not have greater than 2.5% DDT-r in their dicofol technical, as well. RD should inform Makhteshim that additional DDTr impurities have been detected and require a new CSF from Makhteshim within 30 days, along with supporting analytical data. Required supporting data will include reanalysis of their technical by their HPLC method, involving gradient elution. The analysis should be continued for at least 60 minutes beyond the elution of Cl-DDT, in order to detect the higher molecular weight DDT-r impurities.

Concurrently we request BUD to immediately initiate analyses of current samples of both Rohm & Haas and Makhteshim dicofol technicals, as an independent check on the registrants' analyses. RD should ensure that BUD has appropriate samples and standards. RCB has already forwarded copies of the registrants' analytical methods to BUD.

Attachment: Confidential Appendix:Attached to copies to:
D. Marlow, S. Hummel, M. Slimak, W. Jordan, K. Barbehenn,
R. Hitch, P. Flaherty, Dicofol SF, Dicofol S.R.F. (Hummel)

cc:J. Touhey-BUD, D. Marlow-BUD, S. Hummel-RCB, M. Rostker-TS-788
M. Slimak- EEB, W. Jordan-OGC, K. Barbehenn-SIS/HED, R. Hitch-EAB,
P. Flaherty-OCM, Dicofol SF, Dicofol SRF

TS-769:RCB:CM#2:RM804:SHummel:wh:9/18/86

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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
-

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.
