MEMORANDUM

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)

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.

\[ \text{DDT or Cl-DDT analog} \]

\[ \text{DDE analog} \]
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)

M. Slimak- EEB, W. Jordan-OGC, K. Barbehenn-SIS/HED, R. Hitch-EAB,
P. Flaherty-OCM, Dicofol SF, Dicofol SRF

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
X Description of product quality control procedures
___ Identity of the source of product ingredients
___ Sales or other commercial/financial information
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