MEMORANDUM


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Introduction

In response to the 9/30/91 DCI Rohm and Haas Co. has submitted product chemistry data on Kelthane® Technical B [dicofol; 1,1-bis(chlorophenyl)-2,2,2-trichloroethanol]. The data were submitted 10/1/92. The data submitted are in support of Guidelines 63-2, 63-4, 63-5, and 63-13. Previously, we [S. Funk 6/18/92 review of CBRS 9847] found the protocols for these studies acceptable. The chemical structure for dicofol, a List A acaricide, is given below.

Conclusions

We found no deficiencies regarding guidelines 63-2, 63-4, 63-5, and 63-13. As noted in the aforesaid review, unaddressed data gaps exist in 63-14, 63-17, and 63-20.
## Detailed Considerations

### 63-2 - Color
Very dark reddish brown by visual observation.

### 63-4 - Odor
Fairly strong aromatic; like fresh cut hay at ambient temperature as determined by inhalation.

### 63-5 - Melting Point
"Could not be determined [by capillary with oil bath (NBS traceable thermometer; reference compounds)] because Kelthane Technical B is not a crystalline solid at room temperature. It can be best described as an extremely viscous, non-free flowing liquid."

### 63-13 - Stability
**Metals** - Very low corrosion rate of 0.1 mils/y of mild steel after exposure for 195.75 hr. at 73-80°C. About 4% AI loss.

**Metal Ions** - Exposure to ferric and ferrous oxides at 73-80°C for 7 days caused 100% AI loss. Results were verified with differential scanning calorimetry.

**Sunlight** - No AI loss after 72 hr. "accelerated" exposure to artificial.

**Temperature** - Stable for 1.5 y. at normal room temperature and for 7 days at 77.5-82°C.

No further information is required under these topics.