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

OCT 24 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Partial Response by UCB Chemical Corporation to
Data Gaps Identified by the Product Chemistry
Chapter of the Thiram Registration Standard
(Accession Number 259248, RCB No. 1455).

FROM: Gobind P. Makhijani, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C) *G.P. Makhijani*

TO: Henry Jacoby
Product Manager, Team #21
Registration Division (TS-767C)

and

Amy Rispin, Chief
Science Integration Staff
Hazard Evaluation Division (TS-769C)

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

In response to the data call-in for the Product Chemistry chapter of the Thiram Registration Standard, the UCB Chemical Corporation has submitted additional information for their MUP (EPA Registration Nos. 45728-1, 1187-131, and 8326-2) under topics §62-3 and 63-9. These are discussed below:

§ 62-3 Analytical Methods to Verify Certified Limits:

The registrant has submitted analytical methodology for determination of two intentionally added ingredients in this MUP. These procedures are discussed in Confidential Appendix A of this report. A method for determination of N,N'-ethylenethiourea (ETU) in thiram was also submitted. This procedure is also discussed in Confidential Appendix A.

No validation data were submitted, however, ETU is not considered to be a problem with this chemical. ETU presence, if any, is estimated to be below 100 ppm. No additional information is needed for this part of the topic. Validation data for the analytical methods to verify certified limits for the active ingredients and other impurities are still needed (see table B). This data gap remains unresolved.

63-9 Vapor Pressure: 1.7×10^{-5} mm Hg at 25 °C

No further information is needed for this topic.

An updated table B for this thiram MUP is attached.

Attachment I: Table B (3 pages).

Copies to: Thiram Registration Standard File , G. Makhijani,
R. Perfetti, PMSD/ISB, H. Jacoby, PM #21, R.F., circ.

Attachment II: Confidential Appendix A (1 page).

Copies to: Thiram Registration Standard File , G. Makhijani,
R. Perfetti, PMSD/ISB, H. Jacoby, PM #21.

cc: Thiram Registration Standard, R.F., G. Makhijani,
R. Perfetti, PMSD/ISB, S.F., circ., H. Jacoby PM #21

TABLE B

Summary of Product Chemistry Data Submitted for Thiram: Registration No. 8326-2 (Prochimie),
45728-1 (UCB) and 1187-131 (Virginia Chemical).^{1/}

§158.120 - PRODUCT CHEMISTRY

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
<u>PRODUCT IDENTITY:</u>					
61-1 - Product Identity and Disclosure of Ingredients (§163.61-4)	MP	R	X		See Registration Standard
61-2 - Description of Beginning Materials & Manufacturing Process (§163.61-4)	MP	R	X		Acc. 257236, 257217
61-3 - Discussion of Formation of Ingredi- ents (§163.61-5)	MP	R	X		Acc. 257236
<u>ANALYSIS AND CERTIFICATION OF PRODUCT INGREDIENTS:</u>					
62-1 - Preliminary Analysis of Product Samples (§163.61-7)	MP	R	X		Acc. 257236, 257218
62-2 - Certification of Ingredient Limits (§163.61-6)	MP	R	X		Acc. 257236, 257218
62-3 - Analytical Methods to Verify Certified Limits (§163.61-7)	MP	R		X	Acc. 257236, 257218 ^{2/}
<u>PHYSICAL AND CHEMICAL CHARACTERISTICS:</u>					
63-2 - Color [§163.61-8(c)(1)]	MP	R	X		Acc. 257219
63-3 - Physical State [§163.61-8(c)(7)]	MP	R	X		Acc. 257219

TABLE B (Continued)

§158.120 - PRODUCT CHEMISTRY (Con't)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
<u>PHYSICAL AND CHEMICAL CHARACTERISTICS:</u>					
63-4 - Odor [§163.61-8(c)(2)]	MP	R	X		Acc. 257236, 257219
63-5 - Melting Point [§163.61-8(c)(3)]	MP	R	X		Acc. 257236, 257219
63-6 - Boiling Point [§163.61-8(c)(9)]	MP	N/A	X		---
63-7 - Density, or Bulk Density [§163.61-8(c)(8)]	MP	R	X		Acc. 257219
63-8 - Solubility [§163.61-8(c)(4)]	MP or PAI	R	X		Acc. 257236, 257219
63-9 - Vapor Pressure [§163.61-8(c)(10)]	PAI	R	X		Acc. 259248
63-10 - Dissociation Constant	PAI	R		X	Studies in progress
63-11 - Octanol/Water Partition Coefficient [§163.61-8(c)(6)]	PAI	R	X		Acc. 257236, 257219
63-12 - pH [§163.61-8(c)(11)]	MP	R	X		Acc. 257219
63-13 - Stability [§163.61-8(c)(5)]	MP	R	X		Acc. 257236, 257219
63-14 - Oxidizing or Reducing Action [§163.61-8(c)(14)]	MP	R		X	

TABLE B (Continued)

§158.120 - PRODUCT CHEMISTRY (Con't)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
<u>PHYSICAL AND CHEMICAL CHARACTERISTICS:</u>					
63-15 - Flammability [§163.61-8(c)(15)]	MP	NA			
63-16 - Explosibility [§163.61-8(c)(15)]	MP	NA			
63-17 - Storage Stability [§163.61-8(c)(12)]	MP	R	X		No data
63-18 - Viscosity [§163.61-8(c)(17)]	MP	NA			
63-19 - Miscibility [163.61-8(c)(16)]	MP	NA			
63-20 - Corrosion Characteristics	MP	R	X		No data
63-21 - Dielectric Breakdown Voltage [§163.61-8(c)(19)]	MP	NA			
<u>Other Requirements:</u>					
64-1 - Submittal of Samples [§163.61-9]	TGAI/MP	R	X		3/

Notes: 1/ Since the registered product contains wetting and dispersing agents, it is considered an MUP.
 2/ Validation data are required.
 3/ The registrants should send samples to Chief, Chemical and Biological Investigation Branch, BUD, OPP/OPTS, USEPA, Building 402 ARC, East Beltsville, MD 20705.

THIRAM

Page 6 is not included in this copy.

Pages _____ through _____ are not included.

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 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.

CONFIDENTIAL APPENDIX

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.
