MEMORANDUM

Subject: Data Call-In for Hexachlorobenzene and Pentachlorobenzene in Technical Simazine; Waiver Request. DP Barcode D186556. MRID No. 42583106. CBRS No. 11187.

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In response to the 09/92 DCI for product chemistry data on hexachlorobenzene (HCB) and pentachlorobenzene (PCB) in technical simazine (100-541), Ciba-Geigy Corporation has submitted a waiver request. The registrant claims CBI status for the information supplied.

Simazine, or 2-chloro-4,6-bis(ethylamino)-s-triazine, is a selective herbicide. Tolerances exist (40 CFR 180.213) for residues of simazine (and metabolites in certain instances) in/on numerous plant commodities and animal products, including eggs (0.02 ppm) and milk (0.02 ppm). Food/feed additive tolerances (40 CFR 185.5350/186.5350) have been established for simazine and metabolites in potable water (0.01 ppm), sugarcane molasses, and sugarcane syrup. The structure of simazine is given in the Confidential Appendix.
Conclusion

The request for data on HCB and PCB contamination in technical simazine is based upon the presence of HCB in atrazine reported by a manufacturer. The information is summarized in *Survey of Industrial Processing Data: Task I- Hexachlorobenzene and Hexachlorobutadiene Pollution from Chlorocarbon Processes*, Charles E. Mumma and Edward W. Lawless, Midwest Research Institute, EPA Contract No. 68-01-2105, EPA-560/3-75-003. The manufacturing process that was reported to generate up to 0.25 ppm HCB in the technical atrazine a waiver is not justified.

Recommendation

CBRS recommends that the waiver be denied and that Ciba-Geigy be advised to submit a protocol for the determination of hexachlorobenzene (HCB) and pentachlorobenzene (PCB) in technical simazine.

Detailed Consideration

The registrant details the manufacturing process (see Confidential Appendix A) and explains why HCB and/or PCB formation during each step is not likely. CBRS agrees that the chemical reactions presented for the reactions involving the hexachlorobenzene (HCB) or pentachlorobenzene (PCB). Moreover it has been reported (Survey of Industrial Processing Data: Task I- Hexachlorobenzene and Hexachlorobutadiene Pollution from Chlorocarbon Processes, Charles E. Mumma and Edward W. Lawless, Midwest Research Institute, EPA Contract No. 68-01-2105, EPA-560/3-75-003) that levels of HCB ranging up to 0.25 ppm are found in technical atrazine manufactured the absence of other evidence this empirical observation, reported
by the manufacturer, must be assumed accurate.
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.

X 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.