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

FEB 11 1993

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MEMORANDUM

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

From: Stephen Funk, Ph.D., Chemist *S. R. Funk*  
Special Review Section I  
Chemistry Branch II - Reregistration Support  
Health Effects Division (H7509C)

Through: Andrew Rathman, Section Head *AR*  
Special Review Section I  
Chemistry Branch II - Reregistration Support  
Health Effects Division (H7509C)

To: Dennis Utterback  
Special Review Branch  
Special Review and Reregistration Division (H7508W)

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.



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contains at least 50% recycled fiber

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

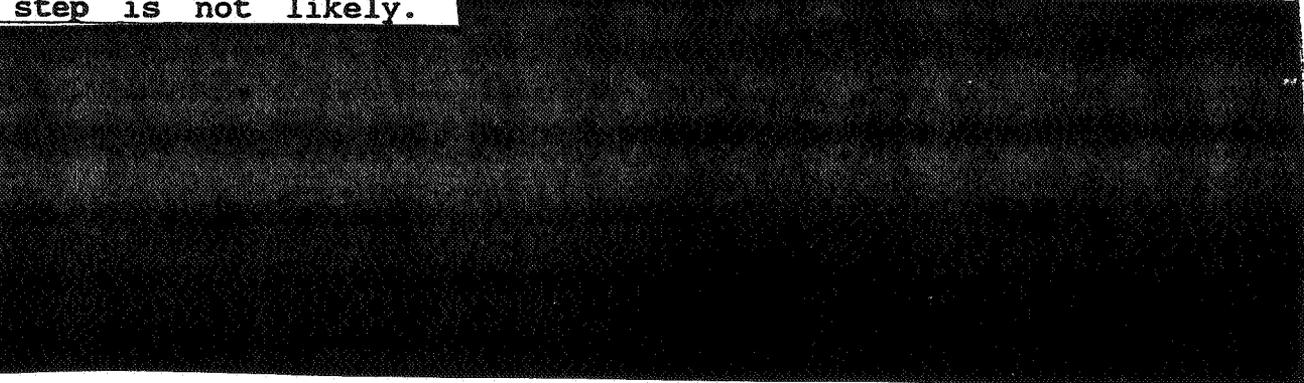
[REDACTED] a waiver is not justified.

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 [REDACTED] hexachlorobenzene (HCB) or pentachlorobenzene (PCB).

[REDACTED] 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

[REDACTED] the absence of other evidence this empirical observation, reported

MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

by the manufacturer, must be assumed accurate.

Attachment: Confidential Appendix A

cc with Confidential Appendix A: HCB Subject File, Simazine Reregistration File, RF, S. Funk.  
cc withOUT Confidential Appendix A: circ.

RDI: A. Rathman:02/11/93:M. Metzger:02/11/93:E. Zager:02/11/93:

H7509C:CBRS:S.Funk:305-5430:CM#2:RM803:SF(0293.11b/12b):02/03/93.

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SIMAZINE

080807

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Page \_\_\_ is not included in this copy.

Pages 4 through 5 are not included.

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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

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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.

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