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

FEB 17 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Response to the Simazine Reregistration Standard:
Product Chemistry (MRID # 42503701, CBRS # 10,753,
Barcode: D183773).

FROM: R. B. Perfetti Ph.D., Chemist *R B Perfetti*
Reregistration Section 1
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C)

THRU: W. Smith, Ph.D., Acting Section Head *William D. Smith*
Reregistration Section 1.
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C)

TO: Lois Rossi, Chief
Reregistration Branch
Special Review & Reregistration Division (H7508W)

and

E. Saito, Chief
Chemical Coordination Branch
Health Effects Division (H7509C)

Attached is a review of product chemistry responses to the Simazine Reregistration Standard submitted by Ciba-Geigy. This review was completed by Dynamac Corporation under supervision of CBRS, HED. It has undergone secondary review in the branch and has been revised to reflect Agency policies.

A revised product chemistry data summary sheet is included.

If you need additional input please advise.

Attachment 1: Simazine Product Chemistry Data Review.

Attachment 2: Confidential Appendix For Simazine Product Chemistry



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contains at least 50% recycled fiber

cc (With Attachments 1 and 2): RBP, Simazine Reregistration
Standard File, Simazine Subject File and Dynamac.

cc (with Attachment 1): Circulation

cc (Without Attachments): RF.

Final Report

SIMAZINE
Shaughnessy No. 080807
(CBRS No. 10753; DP Barcode
D183773; Case 0070)

TASK 4
Registrant's Response to Product
Chemistry Data Requirements

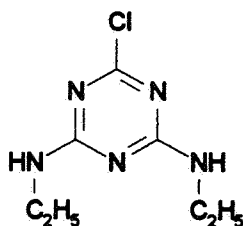
January 11, 1993

Contract No. 68-D2-0053

Submitted to:
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Arlington, VA 22202

Submitted by:
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SIMAZINE



Shaughnessy No. 080807

(CBRS No. 10753; DP Barcode D183773; Case 0070)

Task 4

REGISTRANT'S RESPONSE TO PRODUCT CHEMISTRY DATA REQUIREMENTS

BACKGROUND

In response to an Agency Memorandum (W. Smith; CBRS No. 9496, dated 7/30/92), Ciba-Geigy Corporation has submitted a single volume of product chemistry data (CBRS No. 10753; 1992; MRID 42503701) for the 97% technical (T; EPA Reg. No. 100-541). These data are supplemental to MRID 42181501. The submitted data and our conclusions are discussed below.

61-1. Product Identity and Disclosure of Ingredients

The Agency Memorandum (W. Smith; CBRS No. 9496, dated 7/30/92) does not require additional information pertaining to the product identity of the Ciba-Geigy 97% T (EPA Reg. No. 100-541); however, the registrant has submitted a Confidential Statement of Formula dated 9/30/92. These data are presented in the Confidential Appendix. *These data do not satisfy the requirements of 40 CFR §158.155 (Guideline Reference No. 61-1) regarding product identity for the Ciba-Geigy 97% T (EPA Reg. No. 100-541) because two compounds listed on the CSF must be identified as active ingredients since they are pesticidally active. We also note that all pesticidally-active compounds must be included in the label claim. Additional data are required.*

information is

62-2. Certification of Limits

The Agency Memorandum (W. Smith; CBRS No. 9496, dated 7/30/92) requires Ciba-Geigy to submit the certified limits of the 97% T (EPA Reg. No. 100-541) on EPA Form 8570-4. In response, Ciba-Geigy has submitted a CSF dated 9/30/92 for the 97% T which is presented in the Confidential Appendix. These data satisfy the requirements of 40 CFR §158.175 (Guideline Reference No. 62-2) regarding certified limits for the Ciba-Geigy 97% T (EPA Reg. No. 100-541). No additional data are required.

62-3. Enforcement Analytical Methods

The Agency Memorandum (W. Smith; CBRS No. 9496, dated 7/30/92) requires additional information pertaining to analytical methods which are suitable for enforcement purposes for an impurity, and a

nitrosamines in the 97% T (EPA Reg. No. 100-541). Ciba-Geigy has submitted (1992; MRID 42503701) supplemental information concerning the analytical methods for the determination of an impurity and the nitrosamines of simazine. This information is discussed in the Confidential Appendix. This information satisfies the requirements of 40 CFR §158.180 (Guideline Reference No. 62-3) regarding enforcement analytical methods for the Ciba-Geigy 97% T (EPA Reg. No. 100-541). No additional data are required.

MASTER RECORD IDENTIFICATION NUMBERS

Citations for the MRID documents referred to in this review are presented below.

42503701 Stubbs, D.S. (1992) Technical Simazine Supplement to Product Chemistry. Unpublished compilation prepared by Ciba-Geigy Corporation. 50 p.

Case No. 0070
Chemical No. 080607

Case Name: Simazine
Registrant: Ciba-Geigy Corporation
Product(s): 97% T (EPA Reg. No. 100-541)

PRODUCT CHEMISTRY DATA SUMMARY

Guideline Number	Requirement	Are Data Requirements Fulfilled? ^a	MRID Number
61-1	Product Identity and Disclosure of Ingredients	N ^b	CSF dated 9/30/92
61-2	Starting Materials and Manufacturing Process	Y	
61-3	Discussion of Formation of Impurities	Y	
62-1	Preliminary Analysis	Y	
62-2	Certification of Ingredient Limits	Y	42503701 CSF dated 9/30/92
62-3	Analytical Methods to Verify the Certified Limits	Y	42503701
63-2	Color	Y	
63-3	Physical State	Y	
63-4	Odor	Y	
63-5	Melting Point	Y	
63-6	Boiling Point	N/A	
63-7	Density, Bulk Density or Specific Gravity	Y	
63-8	Solubility	Y	
63-9	Vapor Pressure	Y	
63-10	Dissociation Constant	Y	
63-11	Octanol/Water Partition Coefficient	Y	
63-12	pH	Y	
63-13	Stability	Y	
63-14	Oxidizing or Reducing Action	Y	
63-15	Flammability	N/A	
63-16	Explosibility	Y	
63-17	Storage Stability	Y	
63-18	Viscosity	N/A	
63-19	Miscibility	N/A	
63-20	Corrosion Characteristics	N	

^a Y = Yes; N = No; N/A = Not Applicable. Data were submitted in response to the Agency Memorandum (W. Smith; CBRS No. 9496, dated 7/30/92). Data requirements followed by MRID citations reflect conclusions determined in this document (CBRS No. 10753).

^b Two compounds listed on the CSF must be identified as active ingredients as they are pesticidally active. We also note that all pesticidally-active compounds must be included in the label claim.

CONFIDENTIAL

SIMAZINE (CIBA-GEIGY: CBRS NO. 10753)

PRODUCT CHEMISTRY

TASK 4

(Final Report)

CONFIDENTIAL APPENDIX

2 Page(s)

Confidential Appendix to the Scientific Review of a Registration Standard Followup Report for the pesticide simazine by the Chemistry Branch II Reregistration Support [Confidential FIFRA Trade Secret/CBI].

SIMAZINE

080807

Page ___ is not included in this copy.

Pages 8 through 9 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.
