MEMORANDUM


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THROUGH: Robert S. Quick, Section Head Tolerance Petition Section I Residue Chemistry Branch Hazard Evaluation Division (TS-769C)

TO: Lois Rossi, PM#21 Herbicide-Fungicide Branch Registration Division (TS-767C)

Background

Fermenta Plant Protection Company has submitted its response to EPA's 6/9/87 Data Call-In Notice for analytical chemistry data on polyhalogenated dibenzo-p-dioxins/dibenzofurans in the fungicide chlorothalonil. These data concern the products Technical Chlorothalonil Fungicide (EPA Reg. No. 50534-7) and 21 end-use products. Cancellation is requested for 7 of these end-use products.

The firm's response, dated 9/18/87 and revised 12/21/87, contains an argument why chlorinated dibenzo-p-dioxins (CDDs) and dibenzofurans (CDFs) should not form in the manufacturing process. The description of the manufacturing process, Confidential Statements of Formula, and discussion of formation of non-dioxin/furan impurities is incorporated by reference to previous submissions and are given in the Product Chemistry Chapter to the FRSTR document, dated 2/19/88.

Conclusions

1. The required Confidential Statement of Formula and description of beginning materials and manufacturing process appear in the Product Chemistry Chapter of the FRSTR document, dated 2/19/88. These Data Call-In requirements are satisfied.