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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM (CONFIDENTIAL)

SUBJECT: Product Chemistry Data Review for Technical 97.5% Chlorothalonil to Determine the Potential for Halogenated Dibenzop-Dioxin/Dibenzofuran Formation. I. D. No. 1812-268. Record No. 256338. MRID No. 40611201. DEB No. 6121

FROM: Stephen Funk, Chemist
Special Registration Section I *S Funk*
Dietary Exposure Branch
Health Effects Division (H7509C)

THRU: Andrew Rathman, Section Head
Special Registration Section I *ARR*
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: E. Feris, PM 74
Special Review/
Reregistration Division (H7508C)

Background

In response to a 06/09/87 DCI, Griffin Corporation, Valdosta, GA submitted (05/02/88, received 05/03/88) manufacturing data for technical 97.5% chlorothalonil, or daconil, or 2,4,5,6-tetrachloro-1,3-benzenedicarbonitrile, or 2,4,5,6-tetrachloro-1,3-dicyanobenzene. The registrant claims CBI status for the information supplied. The purpose of the DCI is to acquire information on the potential for formation of halogenated dibenzop-dioxin or dibenzofuran contaminants during certain manufacturing processes. Three specific types of information were requested (Pesticide Assessment Guidelines, Subdivision D, Sections 61-1, 61-2, and 61-3):

1. Product identity and ingredients.
2. Description of beginning materials and manufacturing process.

Chlorothalonil

Page ___ is not included in this copy.

Pages 2 through 3 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.
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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.

Chlorothalonil

Page _____ is not included in this copy.

Pages 4 through 5 are not included.

The material not included contains the following type of information:

___ Identity of product inert ingredients.

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Recommendation

DEB recommends that Griffin Corporation be requested to supply analytical chemistry data on chlorinated dibenzo-p-dioxins and chlorinated dibenzofurans in technical chlorothalonil. Nothing in the manufacturing process presented by the registrant warrants an exemption from this requirement. The registrant should submit sampling and analytical method protocols before embarking upon an analysis program.

Additionally, DEB recommends that Griffin Corporation be requested to supply the missing data/information referenced in the Conclusion, items (a) - (j).

cc: Dioxin SF, RF, R. Schmitt (Branch Chief), Funk, Eldredge
(PMSD, ISB).

RDI:A. Rathman:02/21/90:E. Zager:02/21/90:
H7509C:DEB:S. Funk:557-1439:CM#2:Rm803-A:SF (DIOX.31):02/14/90