

US EPA ARCHIVE DOCUMENT

JAShaughnessy ow
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279-EXP-506

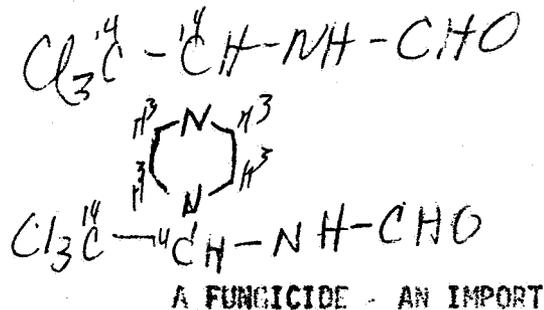
Preliminary Evaluation of Temp. Permit
for NEW CHEMICAL, CA 70203 on Roses
Submitted by Cela GMBH (Germany)
c/o EM Laboratories on 2-18-72

Introduction

Chemical name is Piperazin-1,4-diyl-bis[1-(2,2,2-trichloroethyl)-formamide]. I have not been able to find this name in the CA, but CA style would be 1,4-Piperazinediylbis[1-(2,2,2-trichloroethyl)-formamide]. We must ask that the CA name is used.

No common name

Other names are: CA 70203, Cela W524, and triforine.



Mfg. Process

Not submitted.

Storage Stability

No data.

Percentage Composition of Tech

No information.

Methods of Analysis for Principal Component and Impurities

None submitted.

Analytical Standards

None submitted.

Properties of Tech**Colorless crystals****M.P. 155°C (Decomposes)****V.P. 2×10^{-7} Torr at 25°C****Solubility****Sol. in DMF, DMSO, N-methylpyrrolidone.**

Mod. sol. in tetrahydrofuran

Sl. sol. in cyclohexanone, dioxane

Hardly (?) sol. in acetone, benzene, chloroform, methylene chloride, pet ether, CCl_4 Sol. in H₂O is 27 ppm.**Products Involved**

20% EC

Possible Metabolites

? No mention.

Directions for Use

20 EC Roses 10 fl. oz. of 20% EC per 100 gallon water. Repeat every 7-14 days as necessary.

There are no analytical methods of any kind. There are no environmental data of any kind.**Conclusions and Recommendations****Object to this permit with the following comments:**

1. C-28 (complete formula of EC)
2. Submit the mfg. process
3. Submit storage stability data for formulation
4. Submit the percentage composition of tech chemical.
5. Submit analytical methods for principal component and for impurities in the tech. chemical.

3

6. C-70 (analytical standards)

7.* Submit a metabolic study in plants.

8.* Submit all data required by PR 70-15.

*Nos. 7 and 8 are not strictly required for a temp. permit on roses (in my opinion).

9. Submit evidence that the chemical name used is Chemical Abstracts style. We would accept references from ACS publication or a letter from the nomenclature director of Chemical Abstracts.