



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 10 1988

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. No. 707-203
Rohm and Haas Kelthane Technical
Additional Product Chemistry Data supporting
Amendment to reduce DDTr impurities to 0.1%
[Supplement to MRID No. 405045-01, RCB No. 4116]

FROM: Susan V. Hummel, Chemist
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THRU: Edward Zager, Section Head
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TO: Dennis Edwards/I. Gairola, PM#12
Insecticide Rodenticide Branch
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Rohm and Haas Company has submitted additional information on the starting materials used in the manufacture of Kelthane Technical, containing 91% dicofol [1,1-bis(chlorophenyl)-2,2,2-trichloroethanol], with DDTr impurities of less than 0.1%. This submission is in response to EPA letter of 3/25/88 (See S. Hummel review of 2/88).

This submission (Rohm and Haas letter of 7/8/88) contains a supplement to MRID No. 405045-01. The supplement contains a cover page, a statement of data confidentiality claims, and a crossreference to a confidential attachment which is not attached. Without the confidential attachment, the submission cannot be reviewed. Therefore, all deficiencies outlined in our review of 2/88 remain outstanding.

CONCLUSIONS AND RECOMMENDATIONS

For further consideration, the product manager should forward the full submission, including the confidential attachment, to RCB for review. If the product manager does not have a copy of the confidential attachment, it should be requested from Rohm and Haas.

All deficiencies outlined in our review of 2/88 remain outstanding.

cc: R.F., Circu, dicofol S.F., S. Hummel, Dicofol Reg Std
file (W. Boodee), dicofol special review file (S. Hummel),
PMSD/ISB

RDI:EZ:08/09/88:RDS:08/09/88

TS-769:RCB:SVH:svh:RM810:CM#2:08/09/88