



July 17, 1986

Mr. Lawrence J. Schnaubelt
Registration Division (TS-767C)
U.S. Environmental Protection Agency
Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: Amended Registrations for KELTHANE® Miticide
New Confidential Statements of Formula

KELTHANE® Technical	(707-107)
KELTHANE® Technical A	(707-107)
KELTHANE® Dust Base	(707-66)
KELTHANE® 60 HF	(707-119)
KELTHANE® W	(707-58)
KELTHANE® EC	(707-59)
KELTHANE® AP	(707-76)
KELTHANE® 35	(707-89)
KELTHANE® MF	(707-73)
KELTHANE® 4F	(707-164)

Dear Mr. Schnaubelt:

In compliance with the requirements of 51 Fed. Reg. 19,508 (May 29, 1986), Rohm and Haas Company is submitting herewith applications to amend the registrations for all of our registered products that contain dicofol. In addition, we are submitting a revised Confidential Statement of Formula and five copies of draft labeling for each of the products listed above, as required in 51 Fed. Reg. at 19,518.

We also hereby certify that the upper limit for DDT-related materials ("DDTr"), as defined below, is equal to or less than 2.5 percent of technical grade dicofol (KELTHANE® Technical), as currently manufactured by Rohm and Haas at its facility in [REDACTED]. As has been defined by EPA, DDTr includes the o,p' and p,p' isomers of DDT, DDE, DDD and extra-chlorine DDT (Cl-DDT). 49 Fed. Reg. 10,570 (March 21, 1984); Dicofol Special Review Position Document 2/3 (1984) (Page I-3); 51 Fed. Reg. at 19,510-11.

To demonstrate our ability to produce dicofol containing no more than 2.5% DDTr, we are providing data from current production batches of KELTHANE® Technical. See Attachment 1. We are in the process of incorporating the analytical data in Attachment 1 into revised Product Chemistry Sections to meet the requirements of Subdivisions 61-1, 61-2, 61-3, 62-1, 62-2, and 62-3. I will be forwarding the revised Product Chemistry Sections to you within the next month.

COMMERCIAL/FINANCIAL INFORMATION IS NOT INCLUDED

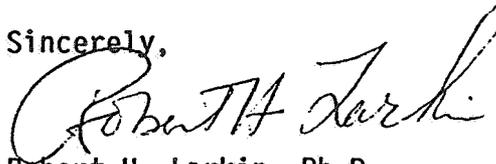
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INFORMATION WHICH MAY REVEAL A MANUFACTURING PROCESS IS NOT INCLUDED

We believe the information in the enclosed binders meets all of the requirements enumerated in the May 29, 1986 Federal Register notice. We therefore request that you conditionally amend our registration until March 30, 1988, before which time we plan to amend our registrations for KELTHANE® products containing less than 0.1% DDTr.

Sincerely,



Robert H. Larkin, Ph.D.
Manager
Agricultural Chemicals Registration and
Regulatory Affairs Department

RHL:mel
(0006h/36Z)

Enclosures

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Kelthane correspondence - 7/16/86

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Pages 3 through 8 are not included in this copy.

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 product 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.
