



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

MAY 29 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Comment on Dicofol 3c2b letter

FROM: Susan V. Hummel, Chemist
Special Registration Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Jeff Kempter
Special Review Branch
Registration Division (TS-767)

Susan V. Hummel

CT

RCB has been asked to comment on a proposed 3c2b letter, requesting additional data, including residue reduction data on dicofol.

For the residue reduction data, it is inappropriate to allow fortified samples to be used. We recommend that the last paragraph on page 2 of the 3c2b letter be changed as follows.

"Field treated samples with residues of dicofol should be analyzed before and after washing, peeling, or cooking or other processing."

We realize that in order to receive analyses within nine months, the samples must be treated and harvested this growing season. Consequently, the 3c2b letter should be sent to the registrants without delay. SRB may wish to call the registrants to inform them of the need for field treated samples this growing season.

We have re-examined the residue data on mint hay and mint oil. The data are inconsistent enough to require additional residue data on mint hay and mint oil. In most of the studies on mint oil, the residue level in the mint hay before processing was not determined. In other studies, where both the hay and the oil was analyzed, it is unclear whether dicofol per se, or dicofol plus degradation products was the analyte. We are, therefore, requiring additional processing studies on mint hay and mint oil.

0190-A

cc:R.F., circu, S. Hummel, dicofol special review file,
dicofol S.F., PMSD/ISB
RDI:EZ:5/24/85:RDS:5/27/85
TS-769:RCB:SVH:svh:RM:810:CM#2:5/27/85