



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JAN 26 1988

MEMORANDUM

SUBJECT: Dow Chemical Company's Response to the Product
Chemistry Chapter of the Telone Registration
Standard (MRID No. 403985-01) RCB No. 3052

FROM: Gobind P. Makhijani, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Lois A. Rossi/Herman Toma, PM Team 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

and

Amy S. Rispin, Ph.D., Chief
Science Integration Staff
Hazard Evaluation Division (TS-769C)

THRU: William J. Boodee, Section Head
Reregistration Section
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

In response to the 1,3-Dichloropropene (Telone)
Reregistration Guidance Document (issued September 18, 1986),
Dow Chemical U.S.A. has submitted additional product chemistry
data dated October 23, 1987 (MRID No. 403985-01) for Telone II,
Manufacturing-Use Product (MP) EPA Registration No. 464-511.

These data and our conclusions are discussed below.
Also, revised tables A and B are provided at the end of this
report.

62-1 - Preliminary Analysis of Product Samples

The registrant has provided analyses of six batches of 1,3-Dichloropropene MP.

The results of the preliminary analyses of these six batches are discussed in Confidential Appendix A (column 2). These data will be reviewed after the receipt of an analytical method for the active ingredients as well as the impurities for which certified limits have been set by the registrant.

62-2 - Certification of Ingredient Limits

The registrant has submitted the required information giving the lower and upper limits for the active ingredients and the upper limits for the impurities in the MP. These limits are discussed in Confidential Appendix A (column 3).

This information however, must be submitted on EPA Form 8570-4 (Rev. 2-85). The registrant should also provide reasons for setting very high upper limits for impurities as compared to the actual analyses of the various batches.

A data gap still exists here.

62-3 - Analytical Methods to Verify Certified Limits

The registrant has stated that a GLC method has been developed to analyze 1,3-dichloropropene for the active ingredients and the impurities. This method is currently under internal review by Dow Chemical Company and will be forwarded to EPA as soon as it is approved for distribution. Therefore, RCB cannot express any opinion at this time on the validity of the method and the results of the analyses of six batches of the MP. However, a separate method of analysis for an intentionally added inert ingredient has been submitted by the registrant and is discussed in Confidential Appendix B.

A data gap still exists here.

Attachment I - Tables A and B (5 pages)

cc: Telone Registration Standard, S.F., Reviewer, RBP,
PMSD/ISB (E. Eldredge), L. Rossi (PM 21), TOX (Coberly)

Attachment II - Confidential Appendices A and B (2 pages)

cc: Telone Registration Standard, S.F., Reviewer, RBP,
PMSD/ISB (E. Eldredge), L. Rossi (PM 21), TOX (Coberly)

cc: Telone Registration Standard, R.F., Reviewer, PMSD/ISB
(E. Eldredge), S.F., L. Rossi (PM 21), Circu, RBP,
TOX (Coberly)



Table A
Generic Data Requirements for Telone TGAI (Unregistered Product)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			Yes	No	
<u>§158.120 Product Chemistry</u>					
<u>Product Identity and Composition</u>					
61-2 - Description of Beginning Materials and Manufacturing Process	TGAI	R	☐	☒	MRID No. 401633-01
61-3 - Discussion of Formation of Impurities	TGAI	R	☐	☒	MRID No. 401633-01
<u>Analysis and Certification of Product Ingredients</u>					
62-1 - Preliminary Analysis of Product Samples	TGAI	CR	☐	☒	MRID No. 403985-04
62-2 - Certification of Ingredient Limits	TGAI	N/A	☐	☐	Unregistered Product
62-3 - Analytical Methods to Verify Certified Limits	TGAI	R	☒	☐	

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Table A
Generic Data Requirements for Telone TGAI (Unregistered Product) (cont'd)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			Yes	No	
<u>§158.120 Product Chemistry</u>					
<u>Physical and Chemical Characteristics</u>					
63-2 - Color	TGAI	R	☐	☒	MRID No. 401633-01
63-3 - Physical State	TGAI	R	☐	☒	MRID No. 401633-01
63-4 - Odor	TGAI	R	☐	☒	MRID No. 401633-01
63-5 - Melting Point	TGAI	N/A	☐	☐	
63-6 - Boiling Point	TGAI	R	☐	☒	MRID No. 401633-01
63-7 - Density, Bulk Density, or Specific Gravity	TGAI	R	☐	☒	MRID No. 401633-01
63-8 - Solubility	TGAI or PAI	R	☐	☒	MRID No. 401633-01
63-9 - Vapor Pressure	PAI	R	☒	☐	
63-10 - Dissociation Constant	PAI	N/A	☐	☐	

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Table A
Generic Data Requirements for Telone TGAI (Unregistered Product) (cont'd)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			Yes	No	
<u>§158.120 Product Chemistry</u>					
<u>Physical and Chemical Characteristics (cont'd)</u>					
63-11 - Octanol/Water Partition Coefficient	PAI	R	☐	☒	MRID No. 401633-01
63-12 - pH	TGAI	N/A	☐	☐	
63-13 - Stability	TGAI	R	☐	☒	MRID No. 401633-01
<u>Other Requirement</u>					
64-1 - Submittal of Samples	TGAI or PAI	CR	☐	☒ 1/	

^{1/} If samples are needed the Agency will request them.

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Table B
Product-Specific Data Requirements for Manufacturing-Use Product Telone II
EPA Registration No. 464-511

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			Yes	No	
<u>§158.120 Product Chemistry</u>					
<u>Product Identity and Composition</u>					
61-1 - Product Identity and Disclosure of Ingredients	MP	R	☐	☒	MRID No. 403985-01
61-2 - Description of Beginning Materials and Manufacturing Process	MP	R	☐	☒	MRID No. 401633-01
61-3 - Discussion of Formation of Impurities	MP	R	☐	☒	MRID No. 401633-01
<u>Analysis and Certification of Product Ingredients</u>					
62-1 - Preliminary Analysis of Product Samples	MP	CR	☐	☒	MRID No. 403985-01
62-2 - Certification of Ingredient Limits	MP	R	☒	☐	MRID No. 403985-01 (Partial)
62-3 - Analytical Methods to Verify Certified Limits	MP	R	☒	☐	

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Table B
Product-Specific Data Requirements for Manufacturing-Use Product Telone II
EPA Registration No. 464-511 (cont'd)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Data Required?		Reference
			Yes	No	
<u>§158.120 Product Chemistry</u>					
<u>Physical and Chemical Characteristics</u>					
63-14 - Oxidizing or Reducing Action	MP	CR	☐	☒	MRID No. 401633-01
63-15 - Flammability	MP	CR	☐	☒	MRID No. 401633-01
63-16 - Explodability	MP	R	☐	☒	MRID No. 401633-01
63-17 - Storage Stability	MP	R	☐	☒	MRID No. 401633-01
63-18 - Viscosity	MP	R	☐	☒	MRID No. 401633-01
63-19 - Miscibility	MP	R	☐	☒	MRID No. 401633-01
63-20 - Corrosion Characteristics	MP	N/A	☐	☒	
<u>Other Requirements</u>					
64-1 - Submittal of Samples ^{1/}	TGAI or PAI	CR			

^{1/} The Agency will request samples if needed.

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