



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

SEP 3 1986

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#'s 6G3352 and 6G3353 - 1,3-Dichloropropene.  
Letter of May 22, 1986. Accession No. 263484.  
RCB Nos. 1186, 1187.

FROM: Lynn M. Bradley, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

*Lynn M Bradley*

TO: Robert A. Forrest, PM Team 21  
Fungicide-Herbicide Branch  
Registration Division (TS-767C)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769C)

THRU: Andrew R. Rathman, Section Head  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

*ARR*

Dow Chemical U.S.A. has responded to RCB's initial reviews of the subject petitions (both dated May 1, 1986, J. Worthington) for Telone™ (1,3-dichloropropene) on several crops. Three points are raised in Dow's letter (D. Fairbairn to H. Jacoby, dated May 22, 1986).

Dow requests that RCB consider data in Accession No. 263484 concerning information on the Telone manufacturing process. This package was submitted in response to the Telone Registration Standard, and after consideration in this review is being returned to the PM to hold until the completed response to the Standard is forwarded for review. Dow also refers to a later Confidential Statement of Formula (CSF), dated January 6, 1986. These two items will be discussed in the Confidential Appendix to this review.

The other issue mentioned in Dow's letter is a question about the application time for the additional plant metabolism study which will be required for a permanent tolerance. The review says "preplant" while the use pattern is for "at-plant" application. We consider the important criteria to be maximum uptake of residues by the plant, in order that sufficient radiolabeled residues are available for characterization. Thus, it would seem that application at or about planting time would be desirable.

### Conclusions

1. An adequate description of the manufacturing process is available.
2. The new CSF should reflect certified upper and lower limits for active ingredients, and upper limits for all other intentionally added ingredients. Impurities at levels > 0.1% should be specifically identified.
3. The requirement for analysis of five recent batches is not satisfied.
4. As noted in the Confidential Appendix, certain additional data regarding the product reflected in the January 6, 1986 CSF are required.
5. At-plant application will be suitable for the metabolism study required for a permanent tolerance on cottonseed and soybeans.

### Recommendations

RCB continues to recommend against establishment of the temporary tolerances proposed in PP#'s 6G3352 and 6G3353. A favorable recommendation will require the following:

1. Analysis of five recent production batches.
2. A CSF reflecting appropriate certified limits and identification of impurities to the 0.1% level as specified in the Product Chemistry Guidelines.

Attachment: Confidential Appendix (copies to TOX, PM21, reading file, PP#6G3352, PP#6G3353, LMB, PMSD/ISB only)

cc ~~W/B~~ <sup>CBI</sup> — PP#'s 6G3352, 6G3353, R.F., Reviewer, PMSD/ISB,

cc W/B CBI: circ, FDA, EEB, EAB, R. Thompson (RTP)  
 TS-769; L.M. Bradley: 557-7378  
 RDI: A.R. Rathman: 8/26/86; R.D. Schmitt: 8/27/86

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Telone

Page \_\_\_\_\_ is not included in this copy.

Pages 3 through 4 are not included.

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 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.

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.

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