



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

DEC 5 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Partial Response (10/11/85) by UCB Chemical Corporation to Data Gap \$63-10, Dissociation Constant, to Support Re-registration of Thiram as Identified in the Product Chemistry Chapter of the 3/2/84 Thiram Registration Standard (RCB #195; Acc. #259809).

FROM: Wei T. Chin, Ph. D., Chemist *W. T. Chin*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Amy Rispin, Chief
Science Integration Staff
Hazard Evaluation Division (TS-769)

and

Henry M. Jacoby
Product Manager, Team #21
Registration Division (TS-767)

In response to the data call-in for the Product Chemistry Chapter of Thiram Registration Standard, the UCB Chemical Corporation submits additional data for their MUP (EPA Registration No. 45728-1) to fill the data gap \$63-10. Dissociation Constant.

Data Gap §63-10:

Dissociation Constant.

The petitioner's response to Data Gap §63-10:

By determination of conductance of tetramethylthiuram disulfide in a mixture of 1,4-dioxane and water (89:11, v/v) under N₂ atmosphere, the dissociation constant of this compound was evaluated as less than 10⁻⁶ mole/liter, or k < 10⁻⁶ mole/l.

RCB's comments/conclusions on the petitioner's response to Data Gap §63-10:

RCB concludes that this data gap is filled.

Other Outstanding Data Gaps with Regard to Product Chemistry:

The petitioner is advised to submit additional information in order to fill the following data gaps identified in the Product Chemistry Chapter of the 3/2/84 Thiram Registration Standard:

§62-3. Analytical methods to verify certified limits

§63-14. Oxidizing or reducing action

§63-17. Storage stability

§63-20. Corrosion characteristics

§64-1. Submittal of samples

Attachment: Table B (updated, 3 pages)

cc: Circ., Thiram Reg. Standard S.F., R.F., W.T.Chin, R.Perfetti, PMSD/ISB

TABLE B Summary of Product Chemistry Data Submitted for Thiram: Registration No. 8326-2 (Prochimie),
45728-1 (UCB) and 1187-131 (Virginia Chemical).1/§158.120 - PRODUCT CHEMISTRY

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
<u>PRODUCT IDENTITY:</u>					
61-1 - Product Identity and Disclosure of Ingredients (§163.61-4)	MP	R		X	See Registration Standard
61-2 - Description of Beginning Materials & Manufacturing Process (§163.61-4)	MP	R		X	Acc. 257236, 257217
61-3 - Discussion of Formation of Ingre- dients (§163.61-5)	MP	R		X	Acc. 257236
<u>ANALYSIS AND CERTIFICATION OF PRODUCT INGREDIENTS:</u>					
62-1 - Preliminary Analysis of Product Samples (§163.61-7)	MP	R		X	Acc. 257236, 257218
62-2 - Certification of Ingredient Limits (§163.61-6)	MP	R		X	Acc. 257236, 257218
62-3 - Analytical Methods to Verify Certified Limits (§163.61-7)	MP	R	X		Acc. 257236, 257218 2/
<u>PHYSICAL AND CHEMICAL CHARACTERISTICS:</u>					
63-2 - Color [§163.61-8(c)(1)]	MP	R		X	Acc. 257219
63-3 - Physical State [§163.61-8(c)(7)]	MP	R		X	Acc. 257219

TABLE B (Continued)

§158.120 - PRODUCT CHEMISTRY (Con't)

Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
PHYSICAL AND CHEMICAL CHARACTERISTICS:					
63-4 - Odor [§163.61-8(c)(2)]	MP	R	X		Acc. 257236, 257219
63-5 - Melting Point [§163.61-8(c)(3)]	MP	R	X		Acc. 257236, 257219
63-6 - Boiling Point [§163.61-8(c)(9)]	MP	N/A	X		---
63-7 - Density, or Bulk Density [§163.61-8(c)(8)]	MP	R	X		Acc. 257219
63-8 - Solubility [§163.61-8(c)(4)]	MP or PAI	R	X		Acc. 257236, 257219
63-9 - Vapor Pressure [§163.61-8(c)(10)]	PAI	R	X		Acc. 259248
63-10 - Dissociation Constant	PAI	R	X		Acc. 259809
63-11 - Octanol/Water Partition Coefficient [§163.61-8(c)(6)]	PAI	R	X		Acc. 257236, 257219
63-12 - pH [§163.61-8(c)(11)]	MP	R	X		Acc. 257219
63-13 - Stability [§163.61-8(c)(5)]	MP	R	X		Acc. 257236, 257219
63-14 - Oxidizing or Reducing Action [§163.61-8(c)(14)]	MP	R		X	

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TABLE B (Continued)

§158.120 - PRODUCT CHEMISTRY (Con't)					
Guideline Citation and Name of Test	Test Substance	Guidelines Status	Are Additional Data Required?		References
			Yes	No	
<u>PHYSICAL AND CHEMICAL CHARACTERISTICS:</u>					
63-15 - Flammability [§163.61-8(c)(15)]	MP	NA			
63-16 - Explodability [§163.61-8(c)(15)]	MP	NA			
63-17 - Storage Stability [§163.61-8(c)(12)]	MP	R	X		No data
63-18 - Viscosity [§163.61-8(c)(17)]	MP	NA			
63-19 - Miscibility [163.61-8(c)(16)]	MP	NA			
63-20 - Corrosion Characteristics	MP	R	X		No data
63-21 - Dielectric Breakdown Voltage [§163.61-8(c)(19)]	MP	NA			
<u>Other Requirements:</u>					
64-1 - Submittal of Samples [§163.61-9]	TGAI/MP	R	X		3/

Notes: 1/ Since the registered product contains wetting and dispersing agents, it is considered an MUP.
 2/ Validation data are required.
 3/ The registrants should send samples to Chief, Chemical and Biological Investigation Branch, BUD, OPP/OPTS, USEPA, Building 402 ARC, East Beltsville, MD 20705.

REGISTRATION DIVISION DATA REVIEW RECORD
Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

11/15/85 M/H

12481

11/15/85

1. CHEMICAL NAME <i>Thiram 079801-7</i>			
2. IDENTIFYING NUMBER <i>45728-1</i>	3. ACTION CODE <i>616</i>	4. ACCESSION NUMBER <i>259809</i> <i>259810</i> <i>259811</i>	TO BE COMPLETED BY PM
			5. RECORD NUMBER <i>162357</i>
			6. REFERENCE NUMBER <i>7</i>
			7. DATE RECEIVED (EPA) <i>10/15/85</i>
	RCB # <i>195</i>		8. STATUTORY DUE DATE <i>NA</i> <i>(Y24186)</i>
		<i>DEC 5 1985</i>	9. PRODUCT MANAGER (PM) <i>JACOBI</i>
			10. PM TEAM NUMBER <i>21</i>

14. CHECK IF APPLICABLE		TO BE COMPLETED BY PCB	
☐ Public Health/Quarantine	☐ Minor Use	11. DATE SENT TO HED/TSS <i>11-15-85</i>	
☐ Substitute Chemical	☐ Part of IPM	12. PRIORITY NUMBER <i>50</i>	
☐ Seasonal Concern	☐ Review Requires Less Than 4 Hours	13. PROJECTED RETURN DATE <i>01-14-86</i>	

15. INSTRUCTIONS TO REVIEWER		F. INSTRUCTIONS
A. HED ☐ Total Assessment - 3(c)(5)	C. ☐ BFSD	<i>Rev. data to support Reregistration of Thiram Standard.</i>
☐ Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.	D. ☐ TSS/RD	
B. SPRD (Send Copy of Form to SPRD PM)	E. ☒ Other	
☐ Chemical Undergoing Active RPAR Review		
☐ Chemical Undergoing Active Registration Standards Review		

16. RELATED ACTIONS

17. (HED) ☐ All Available Information is Available for Review
 18. (HED) ☐ All Available Information is Available for Review
 19. (HED) ☐ All Available Information is Available for Review

TO	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Extension	REDP	RLN	Sec. 18	Short	MNR/USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	ENVIRONMENTAL DATA								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFSD	ECONOMIC ANALYSIS								<i>(6)</i>

20. ☒ Label Submitted with Application Attached	21. ☐ Confidential Statement of Formula	22. ☐ Representative Labels Showing Accepted Uses Attached	23. Date Returned to RD (to be completed by HED) <i>12-5-85</i>	24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.
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