

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB | 1 1993

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

#### **MEMORANDUM**

Subject: Data Call-In for Hexachlorobenzene and Pentachlorobenzene

in Technical Simazine; Waiver Request. DP Barcode

D186556. MRID No. 42583106. CBRS No. 11187.

From:

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Special Review Section I

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Through:

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To:

Dennis Utterback

Special Review Branch

Special Review and Reregistration Division (H7508W)

In response to the 09/92 DCI for product chemistry data on hexachlorobenzene (HCB) and pentachlorobenzene (PCB) in technical simazine (100-541), Ciba-Geigy Corporation has submitted a waiver request. The registrant claims CBI status for the information supplied.

Simazine, or 2-chloro-4,6-bis(ethylamino)-s-triazine, is a selective herbicide. Tolerances exist (40 CFR 180.213) for residues of simazine (and metabolites in certain instances) in/on numerous plant commodities and animal products, including eggs (0.02 ppm) and milk (0.02 ppm). Food/feed additive tolerances (40 CFR 185.5350/186.5350) have been established for simazine and metabolites in potable water (0.01 ppm), sugarcane molasses, and sugarcane syrup. The structure of simazine is given in the Confidential Appendix.



#### Conclusion

The request for data on HCB and PCB contamination in technical simazine is based upon the presence of HCB in atrazine reported by a manufacturer. The information is summarized in Survey of Industrial Processing Data: Task I- Hexachlorobenzene and Hexachlorobutadiene Pollution from Chlorocarbon Processes, Charles E. Mumma and Edward W. Lawless, Midwest Research Institute, EPA Contract No. 68-01-2105, EPA-560/3-75-003. The manufacturing process that was reported to generate up to 0.25 ppm HCB in the technical atrazine

justified.

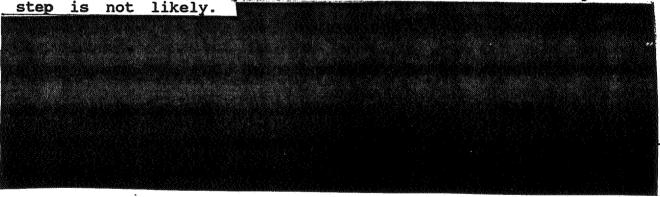
a waiver is not

#### Recommendation

CBRS recommends that the waiver be denied and that Ciba-Geigy be advised to submit a protocol for the determination of hexachlorobenzene (HCB) and pentachlorobenzene (PCB) in technical simazine.

## Detailed Consideration

The registrant details the manufacturing process (see Confidential Appendix A) and explains why HCB and/or PCB formation during each step is not likely



CBRS agree that the chemical reactions presented for the reactions involving the hexachlorosenzene (HCB) or pentachlorosenzene (PCB).

(Survey of Industrial Processing Data: Task I- Hexachlorobenzene and Hexachlorobutadiene Pollution from Chlorocarbon Processes, Charles E. Mumma and Edward W. Lawless, Midwest Research Institute, EPA Contract No. 68-01-2105, EPA-560/3-75-003) that levels of HCB ranging up to 0.25 ppm are found in technical atrazine manufactured

the absence of other evidence this empirical observation, reported

by the manufacturer, must be assumed accurate.

Attachment: Communication Appendix A

cc with Confident Apparedix A: HCB Subject File, Simazine Reregistration File, RF, S. Funk. cc withOUT Confidential Appendix A: circ.

RDI: A. Rathman:02/11/93:M. Metzger:02/11/93:E. Zager:02/11/93:

H7509C:CBRS:S.Funk:305-5430:CM#2:RM803:SF(0293.11b/12b):02/03/93.

# SIMAZINE

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