279-EXP-50G

JAShaughnessy ow 3/23/72

Preliminary Evaluation of Temp. Permit for NEW CHEMICAL. CA 70203 on Roses Submitted by Cela GMBH (Germany) c/o EM Laboratories on 2-18-72

#### Introduction

Chemical name is Piperazin-1,4-diyl-bis[1-(2,2,2-trichloroethyl) - formamide]. I have not been able to find this name in the CA, but CA style would be 1.4-Piperazinediylbis[1-(2.2,2-trichloroethyl)-formamide]. We must ask that the CA name is used.

Ho common name

Other names are: CA 70203. Cela M524, and triforine.

Cl3C - CH-NH-CHO

AFUNGICIDE - AN IMPORT

Mfg. Process

Not submitted.

Storage Stability

No data.

Percentage Composition of Tech

No information.

Methods of Analysis for Principal Component and Impurities

None submitted.

Analytical Standards

Hone submitted.

6.7

#### Properties of Tech

### Colorless crystals

M.P. 1550C (Decomposes)

V.P. 2 X 10-7 Torr at 25°C

### Solubility

Sol. in DMF. DMSO. N-methylpyrrolidone.

Mcd. sol. in tetrahydrofuran

\$1, sol, in cyclohexanone dioxane

Hardly (?) sol. in acetone, benzene, chloroform, methylene chloride, pet ether CC14

44 gr.

Sol. in 1120 is 27 ppm.

#### Products Involved

20% EC

Possible Metabolites

? No mention.

#### Directions for Use

20 EC Roses 10 fl. oz. of 20% EC per 100 gallon water. Repeat every 7-14 days as necessary.

There are no analytical methods of any kind. There are no environmental data of any kind.

## Conclusions and Recommendations

# Object to this permit with the following comments:

- 1. C 28 (complete formula of EC)
- 2. Submit the mfg. process
- 3. Submit storage stability data for formulation
- 4. Submit the percentage composition of tech chemical.
- 5. Submit analytical methods for principal component and for impurities in the tech. chemical.

- 6. C-70 (analytical standards)
- 7.\* Submit a metabolic study in plants.
- 8.\* Submit all data required by PR 79-15.

\*Nos. 7 and 8 are not strictly required for a temp. permit on roses (in my opinion).

9. Submit evidence that the chemical name used is <u>Chemical Abstracts</u> style. We would accept references from ACS publication or a latter from the nomenclature director of <u>Chemical Abstracts</u>.