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

FEB 11 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#0F3918 -- SAN 582H (Dimethanamid). Product Chemistry Requirements. Amendments dated 2/28/93, 2/29/93.

DP Barcode: D187725. CBTS # 11323.

FROM: Michael T. Flood, Ph.D., Chemist
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THROUGH: Debra F. Edwards, Ph.D., Chief
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TO: C. Giles-Parker/J. Stone, PM 22
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CBTS' 2/3/93 memo for PP#0F3918 noted two remaining product chemistry deficiencies -- solubility in water (Guidelines Reference No. 63-8) and corrosion characteristics (Guidelines Reference No. 63-20). The present submission is a response to our memo.

Conclusion and Recommendation

Product chemistry data requirements have now been satisfied. TOX considerations permitting, CBTS recommends for the proposed tolerances of 0.01 ppm for residues of SAN-582H in/on field corn grain, forage and fodder.

Detailed Considerations

Solubility in Water (§63-8)

According to Sandoz, water solubility had been submitted in July, 1990. The assigned MRID # was 415965-07.

CBTS Comment

The solubility data were previously reviewed by Dynamac for

the earlier SAN-582H (M. Flood, memo of 1/18/91). However, the solubility determined was that of the pure active ingredient (PAI) and is therefore independent of formulation. The solubility of the PAI satisfies the requirement of §63-8; therefore, this deficiency is resolved.

Corrosion Characteristics (§63-20)

The report previously submitted under MRID 415965-18 also was for the earlier SAN-582H, but since §63-20 is a requirement for the manufacturing use product the earlier submission does not satisfy requirements for the new product. [SAN-582H is now being manufactured by a different process. The percentage of active ingredient in the technical grade of the active ingredient is slightly different from the earlier one.]

Sandoz has now submitted the following report:

"Corrosivity of SAN 582 H, Technical," Z. Srnak, 1/29/93, Sandoz Lab ID No. 414103-65. (MRID # 426475-01)

Corrosivity was determined by ASTM G 31-72 (reapproved 1985): Laboratory Immersion Corrosion Testing of Metals. The corrosion rate at 55.0±0.5°C was determined to be 0.058±0.016 mm/y.

CBTS Comment

§63-20 is now satisfied.

cc: SF, RF, Circu., Mike Flood, E. Haeberer, PP#0F3918, Jim Kariya (SACB), TOX (Debbie McCall).
H7509C:CBTS:Reviewer(MTF):CM#2:Rm804P:703-305-7990:typist(mtf):2/11/93.
RDI:Branch Chief:Debra Edwards:2/11/93.