

MAR 25 1988

Dr. R.M. Larkin
Rohm & Haas Company
Independence Mall West
Philadelphia, PA 19105

Dear Dr. Larkin:

Subject: Product Chemistry Data for 0.1% DDTr
Kelthane Technical
EPA Registration No. 707-203
Your Application Dated February 5, 1988

*Per Ann Tullman (5/6/91):
re MR 12 4650 4501
for response.
Ekm*

We have completed our review of the product chemistry data to support your amendment reducing levels of DDTr impurities in Kelthane Technical to 0.1 percent. The revised Confidential Statement of Formula (CSF) is acceptable subject to the comments listed below.

1. The submitted data demonstrate that Rohm & Haas can produce dicofol technical containing less than 0.1% DDTr. A certified limit of 0.1% was established for DDTr.
2. The source and specifications of Versene 100, chlorobenzene, methanol, and heptane must be submitted.
3. The list of beginning materials includes isobutanol. The manufacturing process submitted includes the use of butanol in Step 1. You must inform us as to which of these materials is actually used.
4. The analytical methods submitted are adequate. However, the method for the analysis of the polar impurity could have been better described.
5. The following product chemistry data must be submitted within 6 months after commercial production has begun.
 - a. A revised CSF;
 - b. A description of the beginning materials and manufacturing process (61-2);

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CONCURRENCES

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- c. Preliminary analysis (62-1);
 - d. Certified limits (62-2); and
 - e. Analytical methods to verify certified limits (62-3).
6. Any other product chemistry data which have changed as a result of the change to commercial production, including physical and chemical properties, must be submitted within 6 months after commercial production has begun.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

Dennis H. Edwards, Jr.
Product Manager (12)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

For formulation into end-use products intended for use on apples, pears, crabapples, quince, citrus, cotton, dry beans, succulent strawberries, walnuts, filberts, pecans, chestnuts, hickory nuts, tomatoes, peppers, hops, melons, cucumbers, squash, cantaloupe, lawn and turf grasses, ornamentals, flowers, nursery stock, shade trees, and around buildings.

KELTHANE[®]

TECHNICAL

AGRICULTURAL MITICIDE

7-2692

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, absorbed through the skin or inhaled. Causes moderate eye, skin, nose or throat irritation. Avoid contact with skin, eyes and clothing. Skin contact with this pesticide may be hazardous; wear chemical resistant gloves when mixing, loading, or applying this product. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating or drinking. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 to 2 glasses of water and induce vomiting by forcing back of throat with finger. Call a physician. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove the victim to fresh air. Treat the victim symptomatically. Call a physician if problems continue.

IF ON SKIN: Wash exposed area with plenty of soap and water. If irritation persists, call a physician.

IF IN EYES: Flush eyes with plenty of water for at least 15 minutes. If irritation persists, call a physician.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not contaminate water by cleaning of drums or equipment or by disposal of waste.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NOTE: Consult manufacturer for formulation information and for technical bulletins. Formulators are responsible for obtaining EPA registration for their product.

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product unopened within thirty days of purchase to the place of purchase.

CONDITION

Robm and Haas description and only when used under normal conditions. EXPRESS OR IMPLIED WARRANTY OR FITNESS OR USE OF THE PRODUCT. Haas and Robm responsibility for handling the same is granted. NO EVENT SHALL SPECIAL, INC. WHETHER BUYER OTHERWISE.

STORAGE

Do not contaminate drinking water.

PESTICIDE DISPOSAL: disposal of excess violation of Federal use according to or Environment representative a.

CONTAINER DISPOSAL: recycling or reuse handling or by a authorized.

STEPS TO BE FOLLOWED IF RELEASED: See separate sheet or disposal instructions. Report release to nearest responsible authority.



ACTIVE INGREDIENT

1,1-Bis(4-chlorophenyl)-2,2,2-trichloroethane

INERT INGREDIENTS

Total

MAR 23 1983

Kelthane is a registered trademark of Rohm and Haas Company.

EPA Reg. No. 707-203

EPA Est. No. 70711-1

Under the Federal Insecticide, Fungicide, and Rodenticide Act, No. 707-203

NET CONTENTS

250 KG
(551.2 LBS.)