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Mr. John Bergman
Velsicol Chemical Corporation
5600 North River Road
Rosemont, IL 60018-5119

Dear Mr. Bergman,

Subject: Updated Product Chemistry
Technical Chlordane For Export Only
EPA Registration Number 876-280
Your Submissions of April 21, June 22, and July 7, 1987
and June 12, 1989

I. Product Labeling:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

All manufacturing-use products must bear appropriate labeling as specified in 40 CFR 162.10, and PR Notices 83-2 and 83-3. Thus, the following label comments apply:

1. Revise the Environmental Hazards:

This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a National Pollution Discharge Elimination System permit. Do not discharge this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

2. Under Precautionary Statements, after "Wash thoroughly with soap and water after handling and before eating or smoking," add:

Mixers/loaders must wear goggles or a face shield, chemical-resistant apron, long-sleeved shirt and long pants, or coveralls, and unlined, mid-forearm to elbow length chemical-resistant gloves when mixing, loading or otherwise handling concentrate.

Submit five copies of your final printed labeling before you release the product for shipment.

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

II. Product Chemistry:

The product chemistry data (Master Record Identification (MRID) Numbers 411325-01, 402511-01 and 402511-02) have been reviewed in accordance with product chemistry data requirements under 40 CFR Section 158.150. The following comments apply:

61-1: Product Identity and Disclosure of Ingredients

1. Information on Product Identity

The required information (MRID No. 402511-01) needed for the fulfillment of this subtopic has been submitted. No further information is needed at this time.

2. Confidential Statement of Formula (CSF)

The information submitted to date is not sufficient. The latest Confidential Statement of Formula (CSF) in our files is dated 8/9/83.

This CSF lists technical chlordane at 100% by weight. The CSF further notes that this is equivalent to 60% octachloro-4,7-methano-tetrahydroindane and 40% related compounds. (Also, 0.02-0.03% phenolphthalein is added for identification.)

An updated CSF (EPA Form 8570-4, rev. 2-85) is needed and should be submitted.

The CSF should be completed at the time of submission of analytical data listing the active ingredients, impurities, and intentionally added inert ingredients. You indicated that analytical work would be completed in early 1988. To date we have not received this information.

61-2: Description of Beginning Materials and Manufacturing Process

No additional data are needed.

61-3: Discussion of the Formation of Impurities

The information submitted is not considered sufficient to complete review. As indicated above, a more complete discussion of the formation of impurities must be submitted after completion of analytical data for active ingredient and impurities.

62-1: Preliminary Analysis of Product Samples

We cannot comment on the adequacy of this analysis until a complete analysis of one batch of chlordane is submitted. A complete analysis must be submitted after completion of the analytical data you said would be completed in 1988.

62-2: Certification of Limits

The latest Confidential Statement of Formula (CSF) in our files is dated 8/9/83. The form used (EPA Form 8570-4, revised 10/81) is obsolete. The CSF form 8570-4, revised 2/85 is currently in use. It contains columns for information not previously requested (i.e., nominal weight; certified upper and lower limits). These data are now required and must be submitted.

62-3: Analytical Methods to Verify the Certified Limits

No validation data are submitted for the active ingredient and no statements of the precision and accuracy of the methods are submitted. As discussed above, the composition of chlordane is not completely elucidated. You are required to submit validated methods for determination of each of the active ingredients, impurities and intentionally added inert ingredients for which certified limits are required.

63: Physical and Chemical Characteristics

The following information must be submitted:

- 63-8 Solubility - 3.8 mg/100g (or 38ppm) in water
 350g/100 g methanol
 320 g/100 g kerosene

(Note: The information supplied is incomplete. All solubilities must be reported in g/100 ml of solvent and the temperature at which the tests were conducted must be reported.)

- 63-9 Vapor Pressure - Not submitted.

- 63-11 Octanol/Water Partition Coefficient - $K_{ow} = 1.78 \times 10^3$
 (Experimental data not submitted.)

- 63-13 Stability - Not submitted.

- 63-14 Oxidizing or Reducing Action - No oxidizing or reducing action. (Note: The details of tests should be submitted.)

- 63-17 Storage Stability - Not submitted.
 A data gap still exists here.

On the application form you identified the submission as a "Notification" and in your June 12, 1989 letter assumed a response from EPA was not required. Please note that this product is registered under Section 3 of FIFRA and subject to all pertinent regulations under this section. As such any submission of raw data required under Section 3 of FIFRA in support of registration is subject to review and acceptance by EPA. The product chemistry data submitted does not qualify as a Notification under Section 152.46 of CFR 40 but requires an amended application.

If you have any questions in regard to the above comments, please feel free to contact me.

Sincerely,

George T. LaRocca
 Product Manager (15)
 Insecticide-Rodenticide Branch
 Registration Division (H7505C)

Enclosure

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TECHNICAL Chlordane

FOR MANUFACTURING PURPOSES ONLY

FOR EXPORT ONLY OR FOR USE ONLY IN THE MANUFACTURE OF A PESTICIDE PRODUCT FOR EXPORT

This product cannot be used to manufacture a pesticide product to be imported into the United States.

ACTIVE INGREDIENT:
Chlordane* 100.0%

**KEEP OUT OF THE REACH OF CHILDREN
WARNING**

STATEMENT OF PRACTICAL TREATMENT

If swallowed—Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger or blunt object. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention immediately if inhaled—Remove victim to fresh air and apply respiration if indicated. If on skin—Wash promptly with a gentle soap and water. Rinse thoroughly. If in eyes—Rinse eyes for at least 15 minutes with water and call a physician immediately.

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

E.P.A. Reg. No. 876-280-AA
E.P.A. Est. No. 876-

**NET WEIGHT:
410 POUNDS (30 GALLONS)**



ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 5 1990

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended, for the pesticide registered under EPA Reg. No.

876-280



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

May be fatal if swallowed. Do not breathe vapor, fumes, dust, or spray mist. Do not get on skin. Do not contaminate feed or foodstuffs.

Wash thoroughly with soap and water after handling and before eating or smoking. Clean clothing should be used daily. Wear clean synthetic rubber gloves and a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U. S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11.

A committee of the National Academy of Sciences has stated that:

"There are no adequate data to show that these compounds are carcinogenic in humans, but because of their carcinogenicity in certain mouse strains and the extensive similarity of the carcinogenic action of chemicals in animals and in humans, the committee concluded that chlordane, heptachlor, and/or their metabolites may be carcinogenic in humans."

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not discharge into lakes, streams, ponds or public waters unless in accordance with a National Pollution Discharge Elimination System Permit. For guidance contact your regional office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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

This product may not be used in the formulation of a product packaged in containers less than 1/2 gallon in size.

This product may not be used in the formulation of a product containing less than 4 lbs. technical chlordane per gallon.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

PROHIBITIONS:

Do not contaminate water, food, or feed by storage or disposal.

STORAGE

Store in original container in a well ventilated area separately from fertilizer, feed and foodstuff. Avoid cross contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granule saw dust or equivalent material and disposed of as excess pesticide. Wash area of spill with detergent and water.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Triple rinse pesticide from container and use rinsate in the pesticide application. Improper disposal of excess pesticide, mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

After triple rinsing (or equivalent), offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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LIMITED WARRANTY AND LIABILITY

NOTICE: Read this Limited Warranty and Liability before buying or using this product. If terms are not acceptable, return it at once unopened.

It is critical that this product be used and mixed only as specified on the label. The Local laws may make some or all of this paragraph inapplicable or may give you rights in addition to your rights hereunder. Except to the extent prohibited by applicable law, the exclusive remedy of the user or buyer and the limit of liability of this Company or any other Seller for any and all losses, personal injuries or damages resulting from the use of this product, shall be the purchase price paid by the user or buyer for quantity of product involved. Except to the extent prohibited by Local laws there is no warranty, and the Company and other Sellers disclaim all liability for losses, personal injury or damages: (a) arising from any use of this product in a manner or for a purpose not recommended in its label directions or from mixing this product before use with any substance except as recommended by the product's label, (b) arising from handling or storage in violation of label instructions, (c) for all indirect, special or consequential damages, (d) when not reported to this Company within one year of discovery, and (e) arising from product not used within the label-designated shelf life or four years from the date of purchase, whichever first occurs. **THERE ARE NO IMPLIED WARRANTIES AND NO WARRANTIES OF MERCHANTABILITY OR FITNESS.**

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CHEMICAL CORPORATION**

5600 N. RIVER ROAD
ROSEMONT, IL 60018-5119

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