

SUMMARY

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public release after registration)

STUDY TITLE

Analytical Method and Validation for the Determination of
Process Impurities in Telone* II by Gas Chromatography

DATA REQUIREMENT

U.S. EPA Product Chemistry
Guideline OPPTS 830.1800- Enforcement Analytical Method

STUDY DIRECTOR

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STUDY COMPLETED ON

27-AUG-1999

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LABORATORY PROJECT ID

NA-AM-98-081.00

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SUMMARY

An analytical method was validated for the determination of weight percent of impurities in Telone* II by gas chromatography (GC) with a DB-1701 column and TCD detection. Quantitation of the impurities was achieved by comparing the detector response of the sample to that of a standard using external standard calibration.

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I. ABSTRACT

An analytical method was validated for the determination of weight percent of process impurities in Telone II* by gas chromatography (GC) with a DB-1701 column and TCD detection. Quantitation of the impurities was achieved by comparing the detector response of the sample to that of a standard using external standard calibration. Detector response was found to be linear for each impurity over the range of at least 0.38 mg/mL to 11.8 mg/mL. Recovery samples were prepared covering a weight percent range of at least 0.050 to 4.65% wt. The average recoveries for the impurities in the synthetic samples ranged from 100.6 to 107.8%, with relative standard deviations ranging from 7.2 to 12.3%.

The precision of the method was determined by repetitive analysis of two lots of Telone II at least 10 times on different days. The precision for the impurities ranged from 1.1 to 17.8% RSD. The stability of Telone in ethyl acetate was examined by re-analyzing the prepared solutions 10 days after the initial preparation. Solutions had been stored refrigerated or at ambient temperature. All impurities were stable for ten days when stored in screw-capped jars at refrigerated or ambient temperatures.

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II. INTRODUCTION

A. Scope

This method is applicable for the determination of process impurities potentially present in Telone* II. The CAS names with synonyms, CAS registration numbers, and structures of the active ingredients, cis-1,3-dichloropropene and trans-1,3-dichloropropene, and associated process impurities are presented in Table I. This study was performed under protocol NA-AM-98-081.

B. Principle

Solutions of Telone II are prepared in ethyl acetate and injected into a gas chromatograph equipped with a DB-1701 column and TCD detection. Quantitation of the impurities is achieved by comparing the detector response of the sample to that of a standard using external standard calibration. The active ingredients, cis-1,3-dichloropropene and trans-1,3-dichloropropene, and the process impurities, are assayed in the same sample. Statistical methods of means, standard deviations, relative standard deviations, and t-test were used in the study.

III. MATERIALS AND METHODS

A. Safety

Each analyst should be acquainted with potential hazards of the reagents, products, and solvents before starting laboratory work. Sources of information include: material safety data sheets, literature and other related data. Safety information on non-Dow AgroSciences LLC products should be requested from the supplier. Disposal of reagents, reactants, and solvents must be in compliance with local, state, and federal laws and regulations.

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B. Equipment and Materials

1. Balance: analytical, capable of measuring 0.1 mg, Model AE200, Mettler Instrument Corporation, or equivalent.
2. Column: J&W Scientific DB-1701 60 m x 0.32 mm; 1.0 micron film thickness.
3. Gas Chromatograph: Hewlett Packard 6890, or equivalent, equipped with a split injector and TCD detector.
4. Data System: Hewlett Packard ChemServer, or equivalent.
5. Appropriate laboratory glassware, to include volumetric flasks and pipettes.
6. Gas-tight and Hamilton syringes capable of delivering 50 µL to 500 µL, or equivalent.

C. Reagents and Standards

All standards and lots of Telone II were obtained from Test Substance Coordinator, Dow AgroSciences LLC, Indianapolis, IN 46268.

1. (Z)-1,3-dichloropropene analytical standard, cis-1,3-D, Lot TSN100275, 98.9% purity.
2. (E)-1,3-dichloropropene analytical standard, trans-1,3-D, Lot TSN100276, 97.8% purity.
3. AGR238091: 2-chloro-2-methylpentane, 100% purity.
4. AGR238087: 2-chloro-2,3-dimethylbutane, 100% purity.
5. AGR238090: 1,3-dichloropropane, 99.5% purity.
6. AGR238089: 1,2,2-trichloropropane, 96% purity.
7. AGR238088: cis-1,3,3-trichloropropene, 96% purity.
8. AGR238086: trans-1,3,3-trichloropropene, 95% purity.
9. TSN101687: 2-chloro-4-methylpentane, 75% purity.
10. TSN101695: mixture of 3-chloro-2-methylpentane (23% purity) and 2-chloro-2-methylpentane (76% purity).
11. Telone II, Lots TSN101496 and TSN101516.
12. Epoxidized Soybean Oil (ESO), Witco Drapex 6.8.
13. Ethyl Acetate, EM Science, GC Grade or equivalent.

D. Gas Chromatographic Conditions

Instrument:	Hewlett-Packard 6890 or equivalent			
Column:	J&W DB-1701 60 m x 0.32 mm 1.0 micron film			
Inlet:	Split			
Split Ratio:	38:1			
Purge flow:	1.2 mL/min			
Inlet Temperature:	150°C			
Oven Temperature:	Initial 40°C			
Initial Time:	2.0 min			
Oven Gradient:	Level	Rate °C/min	Final °C	Final Time (min)
	1	5.0	80	7.5
	2	5.0	110	1.0
	3	25.0	270	0
Detector:	TCD			
Detector Temperature:	280°C			
Back Inlet:	Constant Flow			
Carrier Flow:	72 mL/min			
Column Flow Rate:	1.9 mL/min			
Injection Volume:	2 µL			
Run Time:	approximately 30 min.			
Time to prepare and analyze one sample:	approximately 40 min			

E. Preparation of Standard Solutions for Calibration, Recovery, and Linearity Studies

Note: For routine impurity analysis, a simplified optional procedure for preparation of the analytical and impurity standards is presented in Appendix I. The stock solutions listed below were prepared for fortification of samples to examine recovery and linearity; the concentrations are therefore higher than stock concentrations for routine assay purposes.

Preparation of Stocks for Determining Relative Retention Times and Response Factors:

A solution of each standard was prepared for determining relative retention time and relative response factor, as designated in Table II. Typically, 50 µL of the individual standard, recording the weight to the nearest 0.1 mg, was transferred to a tared vial and diluted to 1 mL final volume by adding 950 µL ethyl acetate with a gas-tight syringe.

Preparation of an Impurity Stock Solution:

An impurity stock solution containing approximately 150 mg/mL of each impurity, depending upon its density and purity (Table III) was prepared. Typically, 100 μ L of each standard, recording the weight to the nearest 0.1 mg, was transferred to a tared vial. If needed, add ethyl acetate was added to obtain the desired final concentration.

Preparation of an Impurity Standard:

An impurity standard was prepared containing approximately 1.5 mg/mL of each component (Table III) by volumetrically transferring 100 μ L of the impurity stock solution with a gas-tight syringe to a 10-mL volumetric flask and diluting to volume with ethyl acetate.

F. Preparation of Linearity Samples

Linearity samples were prepared by transferring 300 μ L of the impurity stock (containing ~150 mg/mL of each impurity, depending upon its density and purity), to a tared vial and adding 1700 μ L ethyl acetate with a gas-tight or Hamilton syringe, yielding a final volume of 2000 μ L (Table IV). Subsequent dilutions were prepared by volumetrically transferring the appropriate solution with a gas-tight or Hamilton syringe, and adding the appropriate volume of ethyl acetate. Linearity samples for TSN101695, which contains two impurities, were prepared by making a stock solution in ethyl acetate (Table V) and subsequent dilutions.

G. Preparation of Recovery Samples

Recovery samples were prepared by preparing stock solutions of cis-1,3-D, trans-1,3-D and an impurity standard solution (Table VI). The recovery samples were then prepared by combining the appropriate volume of the impurity standard solution with cis-1,3-D or trans-1,3-D (Tables VII). Additional

recovery samples were prepared with new stocks to ensure complete coverage of the potential wt% assay range (Table VIII).

Recovery samples of TSN101695 and TSN101687 were prepared by diluting the standards with cis-1,3-D or trans-1,3-D stock solutions (Tables IX and X):

H. Preparation of Impurity Precision Samples

Precision measurements were performed utilizing two lots of Telone II, TSN101496 and TSN101516. The samples were analyzed at least 5 times on two different days to determine the precision of the method. Samples were prepared by volumetrically pipetting 4 mL Telone into a 10 mL volumetric flask, recording the weight to the nearest 0.1 mg, and diluting to volume with ethyl acetate.

I. Preparation of System Precision Sample

System precision was evaluated by injecting a sample of Telone six consecutive times. To prepare the sample, 4 mL of Telone II was pipetted into a 10 mL volumetric flask, recording the weight of the sample. The sample was diluted to the final volume of 10 mL with ethyl acetate.

J. Method Ruggedness

The ruggedness of the method was determined by injecting standards and technical samples using varying chromatographic conditions, including the use of a DB-1 column (conditions are listed on Figure 24) and a higher injector temperature (270°C) with the DB-1701 column.

K. Methods of Calculation

Calculations were performed by the ChemServer system using external standard calibration or by using manual calculations and the following equations:

Response Factor for Calibration Standard:

$$Rf = \frac{A \times P}{B}$$

Where: Rf = response factor for standard
A = weight (mg), or concentration (mg/mL) of standard
P = purity of standard, expressed as decimal
B = peak area of standard in calibration standard

Concentration of Component in Sample:

$$\% \text{ Component} = \frac{Rf \times D \times E}{F}$$

Where: Rf = response factor for component in standard, calculated above
D = peak area of component in sample
E = multiplication factor (used to adjust for difference in dilution of standard and sample and to express value as weight percent)
F = sample weight, expressed in mg, or concentration (mg/mL)

Determination of Linearity:

The general equation for calculating a least square linear fit for the standard curve is as follows:

$$PR = mC + b$$

where PR = detector response for component
m = slope of the line.
C = concentration of component, in mg/mL.
b = y-axis intercept

Where applicable, corrections were made in the areas of the recovery samples for interferences from minor components within the impurity standards. This was achieved by using the ratio of the interfering impurity to the ratio of the major impurity to calculate the corresponding area due to interference.

IV. RESULTS AND DISCUSSION

A. Interferences

The Telone technical sample matrix was evaluated for interference. No impurities were found to elute with cis-1,3-dichloropropene or trans-1,3-dichloropropene. Interferences were corrected for in recovery samples in which minor impurities in one component interfered with quantitation of another component at varying levels. Under normal standard preparation conditions, these corrections will be unnecessary. Representative chromatograms of the solvent blank, impurity standard, cis-1,3-D and trans-1,3-D calibration standard, and the two lots of Telone are presented in Figures 1 through 5, respectively. Chromatograms of the individual impurity standards are presented in Figures 6 through 15.

B. Relative Response Factors

The relative detector response for each impurity is summarized in Table II. As shown by the similarity of the responses, the impurities can be assigned to groups. If certain standards are not available for some impurities, it is permissible to quantitate them using a standard from within the same group of response factors.

C. Recovery (Accuracy)

A series of synthetic recovery samples were prepared by mixing the impurities, or a mixture of the impurities, with cis-1,3-D or trans-1,3-D stock solutions. The spiked synthetic samples were corrected for interference from minor impurities in the process impurities before determining recovery.

Analysis of a series of recovery samples yielded acceptable recovery data over the range of at least 0.050 wt% to 4.65 wt%. The average recovery across the weight percent range for each impurity ranged from 100.6 to 107.8% with an

overall average of 103.0% (Table XIX). The recovery data for each impurity are summarized in Tables XI through XVIII. A summary is presented in Table XIX.

D. Precision

Eleven samples of Telone II, lots TSN101516 and TSN101496, were prepared and assayed on two different days. The samples were prepared by volumetrically pipetting 4 mL of the Telone, recording the weight of the sample to the nearest 0.1 mg, and volumetrically diluting to the final volume of 10 mL. As shown in Table XX, the average sample weight for the 4-mL volume is $4.85 \text{ g} \pm 0.01 \text{ g}$. Based on the low variability of the sample weights, samples may be prepared by volumetrically pipetting the 4 mL of Telone sample and diluting to 10 mL, using a density of 1.212 g/mL to calculate the sample weight.

The precision data for each impurity in lots TSN101516 and TSN101496 are summarized in Tables XXI through XXVIII. A summary is presented in Table XXIX. Eleven samples of TSN101516 were prepared and assayed on two different days. The impurity precision ranged from 1.5% to 12.0% RSD with an average of 4.4% in the analysis of TSN101516. The impurity precision in TSN101496 ranged from 1.1% to 17.8% RSD, with an average of 6.2%.

Limits of detection and limits of quantitation were determined based on the precision data for Telone lot TSN101516. The limit of detection was calculated as three times the standard deviation while the limit of quantitation was ten times the standard deviation of the precision data, as summarized in Table XXIX.

The precision of the analytical system was evaluated by injecting a precision sample six consecutive times. The relative standard deviation of the peak area of cis-1,3-D and trans-1,3-D was 0.4%. A third peak, with an area of less than

10% of the primary components, had a relative standard deviation of 1.3%.

System precision data is presented in Table XXX.

E. Linearity

Detector response was determined for a series of diluted samples, corresponding to a minimal weight percent of at least 0.0078%wt. The responses for each impurity were linear over the range of at least 0.38 mg/mL to 11.8 mg/mL. Individual linearity plots and the summary of the data for the linearity of each impurity are shown in Figures 16 through Figure 23. All impurities had a regression coefficient of at least 0.9994, with a minimum of nine observations.

F. Stability

Stability of the sample solutions stored in glass jars at ambient and refrigerated temperatures were evaluated by re-analyzing the precision samples from the first day's precision samples for at least one of the technical lots 10 days after initial preparation. The same calibration solutions, used in the initial determination, which had been stored in vials following preparation, were also included in the re-analysis. No differences in concentration was observed between the initial and stored solutions, indicating stability for up to 10 days.

G. Method Ruggedness

Initial chromatographic conditions were tested using a J&W Scientific DB-1 column (60 m x 0.25 mm x 1.0 μ film thickness) with the inlet temperature at 150°C. The early-eluting impurities were not as well resolved in these samples. An example chromatogram is shown in Figure 24.

It was also found that precision was improved using the lower injector temperature, as described in the method. It appeared that some impurities may have degraded at the higher injector temperature.

H. Method Limitation and Notes

1. Initial method development studies showed that injector temperature was important in determining the impurity quantitation. When the injector temperature was too high (270°C), additional impurities were seen, indicating decomposition of the sample in the injector.
2. Equipment, glassware, reagents, and chemicals considered to be equivalent to those specified may be substituted with the understanding that their performance must be confirmed by appropriate tests. Common laboratory supplies are not listed here.
3. The data presented in the report has been calculated in Excel electronic spreadsheets using more figures than shown in the report. Calculation of the values by hand may result in slight differences due to differences in rounding.
4. If volumetric pipettes are used, the weight percent technical may be calculating using the density of 1.2 g/mL to calculate the sample weight with minimal effect on the final weight percent Telone. The concentration of standards should be calculated by weight for improved accuracy.
5. Impurities may be quantitated using a representative impurity standard with a similar relative response factor, as summarized in Table II.

V. CONCLUSIONS

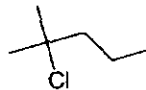
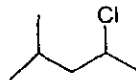

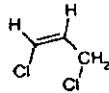

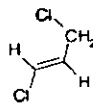


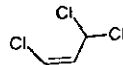
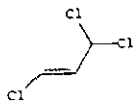
This method is applicable to the determination of eight impurities in Telone over the concentration range of at least 0.38 mg/mL to 11.8 mg/mL. The linearity, precision, and recovery of the analysis results in the validation study were acceptable. This report satisfies the requirement guideline OPPTS 830.1800. In accordance with good laboratory practices, it is recommended that precision and linearity of the method be determined if equipment other than that specified is used.

Raw data generated for this report and the final report will be stored in the
Dow AgroSciences LLC Archives, Building 306, 9330 Zionsville Road,
Indianapolis, IN.

VI. TABLES

Table I

Summary of Telone and Impurity Nomenclature Cross-Reference

Impurity Name	Impurity Name	CAS #	Reference Number	Structure
2-Chloro-2-methylpentane	2-Chloro-2-methylpentane	4325-48-8	AGR238091 TSN101695	
2-Chloro-4-methylpentane	2-Chloro-4-methylpentane		TSN101687	
2-Chloro-2,3-dimethylbutane	2-Chloro-2,3-dimethylbutane	594-57-0	AGR238087	
(Z)-1,3-Dichloropropene	cis-1,3-D cis-1,3-dichloropropene	542-75-6	TSN100275	
3-Chloro-2-methylpentane	3-Chloro-2-Methylpentane		TSN101695	
(E)-1,3-Dichloropropene	trans-1,3-dichloropropene Trans-1,3-D	542-75-6	TSN100276	
1,3-Dichloropropane	1,3-Dichloropropane	142-28-9	AGR238090	
1,2,2-Trichloropropane	1,2,2-Trichloropropane	3175-23-3	AGR238089	
(Z)-1,3,3-Trichloropropene	Cis-1,3,3-Trichloropropene	2953-50-6	AGR238088	
(E)-1,3,3-Trichloropropene	Trans-1,3,3-Trichloropropene	2598-01-8	AGR238086	

VI. TABLES

TABLE II
Preparation of Individual Purity Solutions and Summary of Response Factors and Retention Times

		Purity (%)	Vol (μL)	Wt (mg)	Vol Et Ac (μL)	Total Vol. (mL)	Conc. (mg/mL)	Approx. Retention Time (min)	Peak Area	Response Factor	Response Factor relative to cis-1,3-D	Group
TSN100275	P68I	98.9	50	60.5	950	1.0	59.8345	14.9	265261	2.256E-04	1.00	A
cis-1,3-dichloropropene												
TSN100276	P68J	97.8	50	60.5	950	1.0	59.169	17.6	271337	2.181E-04	0.97	A
trans-1,3-dichloropropene												
TSN101695	P68H	23	200	172.8	800	1.0	39.744	16.2	169373	2.347E-04	1.04	A
3-Cl-2-methylpentane												
2-Cl-2-methylpentane	P68H	76	200	172.8	800	1.0	131.328	14.1	559457	2.347E-04	1.04	A
TSN101687	P68A	75	50	41.8	950	1.0	31.35	14.26	139280	2.251E-04	1.00	A
2-Cl-4-methylpentane												
AGR238091	P68G	100	50	42.6	950	1.0	42.6	14.01	184708	2.306E-04	1.02	A
2-Cl-2-methylpentane												
AGR238090	P68E	99.5	50	58.6	950	1.0	58.307	19.18	258857	2.252E-04	1.00	A
1,3-Dichloropropane												
AGR238087	P68F	100	50	43.2	950	1.0	43.2	14.45	173673	2.487E-04	1.10	B
2-Cl-2,3-dimethylbutane												
AGR238086	P68B	95	50	69.4	950	1.0	65.93	25.01	247406	2.665E-04	1.18	C
trans-1,3,3-trichloropropene												
AGR238088	P68C	96	50	67.4	950	1.0	64.704	21.24	240372	2.692E-04	1.19	C
cis-1,3,3-trichloropropene												
AGR238089	P68D	96	50	65.4	950	1.0	62.784	19.54	231444	2.713E-04	1.20	C
1,2,2-Trichloropropane												

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Table III

Preparation of a Typical Impurity Standard

	P66 A Imp ¹				P66 B ²
	<u>μL</u>	<u>mg</u>	<u>Purity</u>	<u>mg/mL</u>	<u>mg/mL</u>
AGR238091 (2-Cl-2-methylpentane)	100	85.7	100	107.13	1.071
AGR238087 (2-Cl-2,3-dimethylbutane)	100	87.3	100	109.13	1.091
AGR238090 (1,3-dichloropropane)	100	118.0	99.5	146.76	1.468
AGR238089 (1,2,2-trichloropropane)	100	131.9	96	158.28	1.583
AGR238088 (cis-1,3,3-trichloropropene)	200	269.2	96	323.04	3.230
AGR238086 (trans-1,3,3-trichloropropene)	100	136.9	95	162.57	1.626
TSN101687 (2-Cl-4-methylpentane)	100	84.1	75	78.84	0.788
TSN100275 (cis-1,3-D)	0		98.9		
TSN100276 (trans-1,3-D)	0		97.8		
Ethyl Acetate					
Final vol. (μL)	800				

¹Individual standards were volumetrically transferred with a gas-tight syringe to a tared, capped vial. Solution is further diluted prior to assay

²P66B is prepared by volumetrically transferring 100 μL of P66A Imp with a gas-tight syringe to a 10-mL volumetric flask and diluting to volume with ethyl acetate.

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Table IV

Preparation of Linearity Samples and Concentrations of Each Impurity Present

Sample #	Dilution	2-Cl-2- methylpentane	2-Cl-4- methylpentane	2-Cl-2,3- Dimethylbutane	1,3-Dichloro- propane	1,2,2- Trichloro- propane	cis-1,3,3- trichloro- propene	trans-1,3,3- trichloro- propene
		AGR238091	TSN101687	AGR238087	AGR238090	AGR238089	AGR238088	AGR238086
P67A	300uL P66AIMP to 2 ml	16.069	11.827	16.369	22.014	23.742	48.456	24.385
P67B	500 uL P67A to 1mL total	8.034	5.913	8.184	11.007	11.871	24.228	12.193
P67C	500 uL P67B to 1 mL total	4.017	2.957	4.092	5.504	5.936	12.114	6.096
P67D	500 uL P67C to 1 mL total	2.009	1.478	2.046	2.752	2.968	6.057	3.048
P67E	500 uL P67D to 1 mL total	1.004	0.739	1.023	1.376	1.484	3.029	1.524
P67F	500 uL P67E to 1 mL total	0.502	0.370	0.512	0.688	0.742	1.514	0.762
P67G	500 uL P67F to 1 mL total	0.251	0.185	0.256	0.344	0.371	0.757	0.381
P67H	500 uL P67G to 1 mL total	0.126	0.092	0.128	0.172	0.185	0.379	0.191
P67I	200 uL P67A to 2 mL total	1.607	1.183	1.637	2.201	2.374	4.846	2.439
P67J	500 uL P67I to 1 mL total	0.803	0.591	0.818	1.101	1.187	2.423	1.219
P67K	500 uL P67J to 1 mL total	0.402	0.296	0.409	0.550	0.594	1.211	0.610

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Table V

Preparation of Linearity Samples and Concentrations for TSN101695
(2-Chloro-2-methylpentane and 3-Chloro-2-methylpentane)

(a) Preparation of P68H Stock Solution for TSN101695

	μL	mg	Impurity	% Purity	Conc. (mg/mL)
TSN101695	200	172.8	2-Chloro-2-methylpentane	76	131.328
			3-Chloro-2-methylpentane	23	39.744
Ethyl Acetate	800				
Final Volume:	1.0 mL				

(b) Preparation of Additional Dilutions

Sample #	Dilution	2-Cl-2- methylpentane mg/mL	3-Chloro-2- methylpentane mg/mL
P68H	see above	131.328	39.744
P68K	200 μL P68H + 1800 μL Et. Ac.	13.133	3.974
P68L	100 μL P68K + 100 μL Et. Ac.	6.566	1.987
P68M	100 μL P68K + 300 μL Et. Ac.	3.283	0.994
P68N	100 μL P68K + 450 μL Et. Ac.	2.388	0.723
P68O	80 μL P68K + 520 μL Et. Ac.	1.751	0.530
P68P	100 μL P68O + 100 μL Et. Ac.	0.876	0.265
P68Q	20 μL P68M + 180 μL Et. Ac.	0.328	0.0994
P68R	40 μL P68Q + 40 μL Et. Ac.	0.164	0.0497

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Table VI

Stock Solutions used in Preparation of Recovery Samples

	Volume TSN100275	Weight TSN100275	Volume TSN100276	Weight TSN100276	ESO:EtAc ¹	Final volume ²
P74A	5 mL	6.1168 g	--	--	1 mL	10 mL
P74B	--	--	5 mL	6.1394 g	1 mL	10 mL

¹ESO:EtAc was prepared by making a 20% wt/vol solution of Drapex 6.8 Epoxidized Soybean oil (ESO). 10.479 g ESO was weighed into a 50-mL volumetric flask and diluted to volume with ethyl acetate.

²Samples were adjusted to final volume with ethyl acetate (EtAc).

P74 F	Standard	Volume	Weight
	TSN100275	2 mL	2.4399 g
	AGR238091	200 µL	169.0 mg
	AGR238087	200 µL	173.6 mg
	AGR238090	200 µL	235.9 mg
	AGR238089	200 µL	260.5 mg
	AGR238088	400 µL	564.2 mg
	AGR238086	200 µL	276.0 mg
	ESO:EtAc Et Ac	1 mL to 10 mL final volume	

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Table VII

Preparation of Recovery Samples

Sample #	Stock 1	Vol 1 (μ L)	Wt 1 (mg)	Stock 2	Vol 2 (μ L)	Wt 2 (mg)	Final Vol (μ L)
74C	74A	100	105.8	74B	100	105.9	200
74D	74A	50	52.2	74B	100	106.5	150
74E	74A	100	105.8	74B	50	53.2	150
74G	74F	180	179.4	74A	20	20.4	200
74H	74F	150	148.8	74A	50	52.6	200
74I	74F	120	119.2	74A	80	84.2	200
74J	74F	100	99.3	74A	100	106.4	200
74M	74F	80	78.8	74A	120	127.8	200
74N	74F	50	49.4	74A	150	159.3	200
74O	74F	20	19.6	74A	180	189.9	200
74P	74F	100	100.1	74A	900	947.9	200
74Q	74B	50	52.6	74A	800	833.2	850
74R	74B	800	838.3	74A	50	52.7	850
74S	74B	30	30.7	74A	1800	1870.0	1830
74T	74B	1800	1890.1	74A	30	31.0	1830

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Table VIII

Stock Solutions and Preparation of Additional Recovery Samples

	Volume TSN100275	Weight TSN100275	Volume TSN100276	Weight TSN100276	ESO:EtAc ¹	Final volume ²
P79B	5 mL	5.9586 g			1 mL	10 mL

¹ESO:EtAc was prepared by making a 20% wt/vol solution of Drapex 6.8 Epoxidized Soybean oil(ESO). 10.479 g was weighed into a 50-mL volumetric flask and diluted to volume with ethyl acetate.

²Samples are adjusted to final volume with ethyl acetate (EtAc).

P78B	Standard	Volume	Weight
	TSN100275	2 mL	2.4396 g
	AGR238091	200 µL	169.0 mg
	AGR238087	200 µL	168.7 mg
	AGR238090	200 µL	228.5 mg
	AGR238089	200 µL	257.4 mg
	AGR238088	200 µL	267.2 mg
	AGR238086	200 µL	268.1 mg
	ESO:EtAc	1 mL	
	Et Ac	to 10 mL final volume	

Preparation of Additional Recovery Samples

Sample #	Stock 1	Vol 1 (µL)	Stock 2	Vol 2 (µL)	Final Vol (µL)
P79C	P78B	100	P79B	900	1000
P79D	P78B	50	P79B	950	1000
P79E	P78B	30	P79B	1000	1030
P79F	P78B	20	P79B	1000	1020
P79G	P78B	10	P79B	1000	1010
P79H	P79E	100	P79B	100	200
P79I	P79F	100	P79B	100	200
P79J	P78B	200	P79B	800	1000

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Table IX

Preparation of Recovery Samples of TSN101695 (2-Chloro-2-methylpentane and 3-Chloro-2-methylpentane)

Sample #	Stock 1	Vol 1 (μL)	Wt 1 (mg)	Stock 2	Vol 2 (μL)	Wt 2 (mg)	Final Vol (μL)
P75A	TSN101695	90	77.8	74A	300	313.1	390
P75B	P75A	20	19.7	74A	100	102.6	120
P75C	P75A	15	15.0	74A	200	212.2	215
P75D	P75A	20	19.8	74A	900	944.1	920
P75E	P75D	100	105.7	74A	900	941.2	1000
P75F	P75D	50	52.7	74A	150	158.8	200
P75G	P75D	50	52.9	74A	900	937.7	950

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Table X

Preparation of Recovery Samples of TSN101687

Sample #	Stock 1	Vol 1 (μL)	Wt 1 (mg)	Stock 2	Vol 2 (μL)	Wt 2 (mg)	Final Vol (μL)
P77A	TSN101687	60	50.4	74B	600	627.4	660
P77B	P77A	20	20.5	74B	100	107.9	120
P77C	P77A	15	15.0	74B	200	202.4	215
P77D	P77A	20	20.3	74B	900	946.7	920
P77E	P77D	100	106.9	74B	900	939.9	1000
P77F	P77D	50	52.5	74B	150	161.3	200
P77G	P77D	20	21.1	74B	900	942.9	920

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Table XI

Recovery Data for 2-Chloro-2-methylpentane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.050	0.30	0.34	112.2
0.55	3.30	3.49	106.0
1.84	10.58	10.00	94.6
4.80	25.27	25.79	102.1
22.63	151.61	144.88	95.6
Average, %			102.1
Standard Deviation, %:			7.4
RSD, %			7.2
n			5

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Table XII

Recovery Data for 2-Chloro-4-methylpentane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.020	0.13	0.16	125.8
0.051	0.31	0.33	105.0
0.203	1.25	1.20	96.5
0.649	4.00	3.85	96.4
1.546	9.54	8.97	94.0
9.026	57.27	53.41	93.2
Average, %:			101.8
Standard Deviation, %:			12.5
RSD, %:			12.3
n			6

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Table XIII

Recovery Data for 2-Chloro-2,3-dimethylbutane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.028	0.17	0.13	78.4
0.028	0.17	0.19	111.0
0.041	0.25	0.27	110.5
0.056	0.33	0.34	102.3
0.083	0.49	0.57	115.8
0.11	3.37	3.25	96.3
0.14	0.84	0.87	103.6
0.29	1.74	1.98	114.3
0.29	1.74	1.90	109.4
0.29	1.69	1.65	97.7
0.77	4.34	4.54	104.6
1.70	8.68	9.04	104.1
2.12	10.42	10.79	103.6
2.82	13.02	13.65	104.9
3.62	13.62	16.10	118.2
4.22	17.36	18.29	105.3
4.65	16.87	15.94	94.5
Average, %:			104.4
Standard Deviation, %:			9.4
RSD, %:			9.0
n			17

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Table XIV

Recovery Data for 3-Chloro-2-methylpentane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.015	0.09	0.11	119.1
0.17	1.00	1.02	102.4
0.56	3.20	3.00	93.6
1.41	7.65	7.38	96.5
6.85	45.88	43.59	95.0
Average, %			101.3
Standard Deviation, %:			10.5
RSD, %			10.4
n			5

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Table XV

Recovery Data for 1,3-Dichloropropane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.04	0.22	0.24	109.8
0.04	0.23	0.27	120.5
0.06	0.33	0.38	114.7
0.08	0.45	0.44	98.2
0.11	0.66	0.67	101.4
0.15	4.5	4.2	93.2
0.19	1.1	1.1	93.7
0.40	2.3	2.3	99.7
0.40	2.3	2.4	101.5
0.40	2.3	2.1	91.0
1.05	5.9	5.8	98.4
2.29	11.7	11.5	98.3
2.86	14.1	13.9	98.7
3.81	17.6	17.5	99.3
4.89	21.1	21.2	100.5
5.70	23.5	23.3	99.3
6.26	22.7	21.1	92.8
Average, %:			100.6
Standard Deviation, %:			7.8
RSD, %:			7.7
n			17

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Table XVI

Recovery Data for 1,2,2-Trichloropropane in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.041	0.24	0.27	111.7
0.041	0.24	0.29	118.9
0.061	0.36	0.43	118.8
0.082	0.48	0.48	99.3
0.122	0.72	0.74	102.6
0.164	4.94	4.81	97.4
0.211	1.24	1.18	95.2
0.432	2.47	2.29	92.8
2.443	12.50	12.11	96.9
3.051	15.01	14.50	96.6
4.061	18.76	18.10	96.5
5.211	22.51	22.35	99.3
6.071	25.01	24.49	97.9
6.808	24.71	24.56	99.4
Average, %:			101.7
Standard Deviation, %:			8.5
RSD, %:			8.4
n			14

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Table XVII

Recovery Data for cis-1,3,3-Trichloropropene in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.042	0.25	0.28	111.8
0.043	0.25	0.32	126.5
0.063	0.37	0.45	121.0
0.085	0.50	0.56	110.9
0.13	0.75	0.83	111.2
0.17	5.1	5.2	101.8
0.22	1.3	1.3	101.8
0.45	2.6	2.5	98.4
0.92	5.4	5.3	97.8
0.92	5.4	5.5	100.9
2.41	13.5	13.2	97.7
5.29	27.1	26.3	97.0
6.61	32.5	31.4	96.5
7.07	25.7	26.3	102.7
8.80	40.6	39.6	97.4
11.29	48.7	48.6	99.6
13.15	54.2	53.2	98.2
Average, %:			104.2
Standard Deviation, %:			9.0
RSD, %:			8.6
n			17

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Table XVIII

Recovery Data for trans-1,3,3-Trichloropropene in Synthetic Samples

wt% Assayed	Theoretical mg/mL in Sample	Recovered mg/mL	% Recovered
0.042	0.25	0.28	113.5
0.042	0.25	0.34	136.6
0.063	0.37	0.50	134.8
0.084	0.50	0.56	112.5
0.13	0.74	0.85	114.5
0.17	5.09	5.55	109.0
0.22	1.27	1.35	105.9
0.44	2.62	2.53	96.5
0.44	2.62	2.59	98.9
0.44	2.55	2.63	103.3
1.17	6.56	6.82	104.0
2.56	13.11	12.74	97.2
3.20	15.73	15.65	99.5
4.26	19.67	19.55	99.4
5.46	23.60	23.45	99.4
6.36	26.22	25.74	98.2
7.02	25.47	28.06	110.2
Average, %:			107.8
Standard Deviation, %:			12.1
RSD, %:			11.2
n			17

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Table XIX

Summary of Recovery (Accuracy) Data for Impurities in Synthetic Samples

Impurity	Range of Wt % Assayed	n	Average Recovery (%)	Standard Deviation (%)	Relative Standard Deviation (%)
2-Chloro-2-methylpentane	0.050 – 22.63	5	102.1	7.4	7.2
2-Chloro-4-methylpentane	0.020 – 9.03	6	101.8	12.5	12.3
2-Chloro-2,3-dimethylbutane	0.028 – 4.65	17	104.4	9.4	9.0
3-Chloro-2-methylpentane	0.015 – 6.85	5	101.3	10.5	10.4
1,3-Dichloropropane	0.04 – 6.26	17	100.6	7.8	7.7
1,2,2-Trichloropropane	0.041 – 6.81	14	101.7	8.5	8.4
cis-1,3,3-Trichloropropene	0.042 – 13.15	17	104.2	9.0	8.6
trans-1,3,3-Trichloropropene	0.042 – 7.02	17	107.8	12.1	11.2
Overall Average			103.0		
Minimum			100.6		
Maximum			107.8		
Range Included in all Standards	0.050 – 4.65				

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Table XX

Sample Weights for Telone Precision Samples of TSN101516 and TSN101496

	Run #	Volume mL	TSN101516 g	TSN101496 g
Day 1	1	4	4.8552	4.8567
	2	4	4.8532	4.8673
	3	4	4.8498	4.8391
	4	4	4.8468	4.8634
	5	4	4.8613	4.8458
Day 2	1	4	4.8712	4.8625
	2	4	4.8595	4.8394
	3	4	4.8711	4.8539
	4	4	4.8425	4.8326
	5	4	4.8578	4.8525
	6	4	4.8396	4.8465
Average, %			4.855	4.851
Standard Deviation, %			0.010	0.011
Relative Standard Deviation, %			0.2	0.2

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Table XXI

Precision Data for 2-Chloro-2-methylpentane in Telone Samples TSN101516 and
TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.37	0.12
	2	0.37	0.12
	3	0.37	0.13
	4	0.36	0.12
	5	0.38	0.12
Day 2	1	0.37	0.13
	2	0.37	0.13
	3	0.37	0.12
	4	0.38	0.12
	5	0.38	0.12
	6	0.38	0.12
Average, %		0.37	0.12
Standard Deviation, %		0.005	0.005
Relative Standard Deviation, %		1.5	4.3

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Table XXII

Precision Data for 2-Chloro-4-methylpentane in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.15	0.069
	2	0.15	0.065
	3	0.15	0.079
	4	0.14	0.070
	5	0.15	0.074
Day 2	1	0.14	0.081
	2	0.15	0.079
	3	0.15	0.069
	4	0.15	0.071
	5	0.15	0.073
	6	0.15	0.066
Average, %		0.15	0.072
Standard Deviation, %		0.003	0.005
Relative Standard Deviation, %		2.0	7.5

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Table XXIII

Precision Data for 2-Chloro-2,3-dimethylbutane in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.13	0.049
	2	0.13	0.042
	3	0.13	0.068
	4	0.12	0.049
	5	0.14	0.056
Day 2	1	0.12	0.068
	2	0.13	0.064
	3	0.13	0.050
	4	0.13	0.051
	5	0.13	0.054
	6	0.13	0.040
Average, %		0.13	0.054
Standard Deviation, %		0.004	0.010
Relative Standard Deviation, %		3.4	17.8

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Table XXIV

Precision Data for 3-Chloro-2-methylpentane in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.091	0.032
	2	0.089	0.036
	3	0.089	0.033
	4	0.084	0.033
	5	0.092	0.036
Day 2	1	0.085	0.036
	2	0.088	0.037
	3	0.090	0.033
	4	0.090	0.034
	5	0.091	0.035
	6	0.092	0.038
Average, %		0.089	0.035
Standard Deviation, %		0.003	0.002
Relative Standard Deviation, %		3.0	6.0

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Table XXV

Precision Data for 1,3-Dichloropropane in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.047	0.086
	2	0.048	0.080
	3	0.045	0.082
	4	0.046	0.085
	5	0.044	0.080
Day 2	1	0.047	0.083
	2	0.046	0.082
	3	0.049	0.086
	4	0.048	0.085
	5	0.046	0.092
	6	0.042	0.085
Average, %		0.046	0.084
Standard Deviation, %		0.002	0.003
Relative Standard Deviation, %		4.8	3.9

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Table XXVI

Precision Data for 1,2,2-Trichloropropane in Telone Samples TSN101516 and
 TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.032	0.15
	2	0.031	0.15
	3	0.031	0.15
	4	0.026	0.15
	5	0.025	0.15
Day 2	1	0.028	0.15
	2	0.030	0.14
	3	0.034	0.15
	4	0.036	0.15
	5	0.037	0.15
	6	0.031	0.15
Average, %		0.031	0.15
Standard Deviation, %		0.004	0.003
Relative Standard Deviation, %		12.0	2.0

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Table XXVII

Precision Data for cis-1,3,3-Trichloropropene in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.039	0.26
	2	0.038	0.27
	3	0.038	0.26
	4	0.038	0.26
	5	0.038	0.26
Day 2	1	0.037	0.26
	2	0.039	0.26
	3	0.039	0.26
	4	0.042	0.26
	5	0.042	0.26
	6	0.041	0.26
Average, %		0.039	0.26
Standard Deviation, %		0.002	0.003
Relative Standard Deviation, %		3.9	1.1

VI. TABLES

Table XXVIII

Precision Data for trans-1,3,3-Trichloropropene in Telone Samples TSN101516 and TSN101496

	Run #	TSN101516 Weight %	TSN101496 Weight %
Day 1	1	0.0*	0.049
	2	0.0*	0.043
	3	0.0*	0.046
	4	0.0*	0.049
	5	0.0*	0.055
Day 2	1	0.0*	0.051
	2	0.0*	0.047
	3	0.0*	0.046
	4	0.0*	0.048
	5	0.006	0.049
	6	0.013	0.051
Average, %		0.002	0.049
Standard Deviation, %		0.004	0.003
Relative Standard Deviation, %		N/A	6.8

*Not detected in these samples

VI. TABLES

Table XXIX

Summary of Precision Data for Impurities in Telone Samples TSN101516 and TSN101496

Impurity	Standard	TSN101516			TSN101496			LOD ²	LOQ ³
		Average Wt %	Standard Deviation (%)	Relative Standard Deviation (%)	Average Wt %	Standard Deviation (%)	Relative Standard Deviation (%)		
2-Chloro-2-methylpentane	AGR238091 TSN101695	0.37	0.005	1.5	0.12	0.005	4.3	0.015	0.05
2-Chloro-4-methylpentane	TSN101687	0.15	0.003	2.0	0.072	0.005	7.5	0.009	0.03
2-Chloro-2,3-dimethylbutane	AGR238087	0.13	0.004	3.4	0.054	0.01	17.8	0.012	0.04
3-Chloro-2-methylpentane	TSN101695	0.089	0.003	3.0	0.035	0.002	6.0	0.009	0.03
1,3-Dichloropropane	AGR238090	0.046	0.002	4.8	0.084	0.003	3.9	0.006	0.02
1,2,2-Trichloropropane	AGR238089	0.031	0.004	12.0	0.15	0.003	2.0	0.012	0.04
cis-1,3,3-Trichloropropene	AGR238088	0.039	0.002	3.9	0.26	0.003	1.1	0.006	0.02
trans-1,3,3-Trichloropropene	AGR238086	0.002	0.004	N/A ¹	0.049	0.003	6.75	0.012	0.04

¹RSD is not calculated; impurity was detected in only two of the 11 samples analyzed.

²LOD is Limit of Detection for this instrument in this study, based on 3 times the standard deviation for batch TSN101516.

³LOQ is the Limit of Quantitation for this instrument in this study, based on 10 times the standard deviation for batch TSN101516.

VI. TABLES

Table XXX

System Precision Data for Instrument used in Method Validation

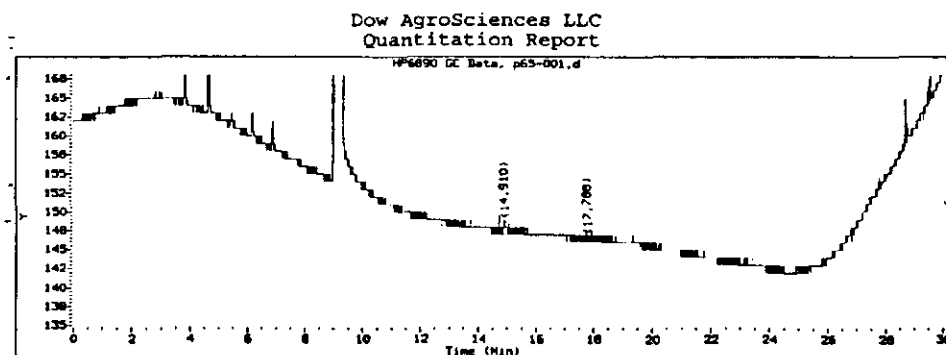
Injection #	Detector Response Area	Detector Response Area	Detector Response Area
1	8068	1151753	989093
2	8212	1161089	995976
3	8243	1164977	999086
4	8346	1163344	997145
5	8104	1163751	998493
6	8128	1162344	996896
Average:	8183.5	1161209.7	996114.8
Std. Dev.:	103.4	4815.3	3618.9
RSD, %:	1.3	0.4	0.4

VII. FIGURES

Figure 1

Representative Chromatogram of Epoxidized Soybean Oil: Ethyl Acetate Solvent
Blank

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-001.d Page 1
Report Date 02/26/1999 08:21



Chromatographic conditions are listed in Section III.D.

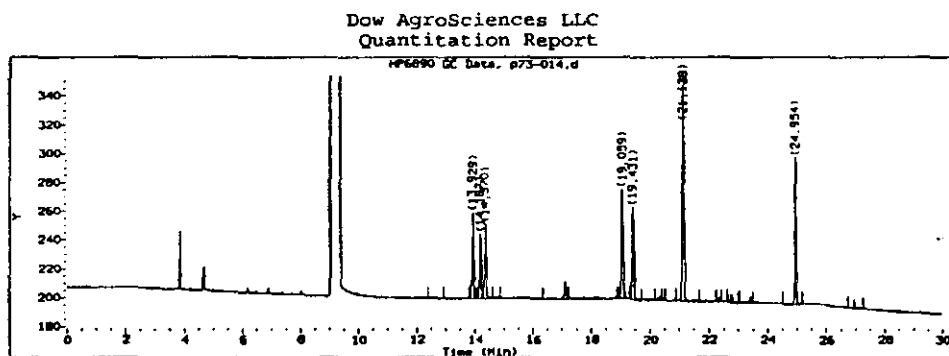
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 2

Representative Chromatogram of Impurity Standards

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p73-014.d Page 1
Report Date 02/22/1999 11:56



Chromatographic conditions are listed in Section III.D.

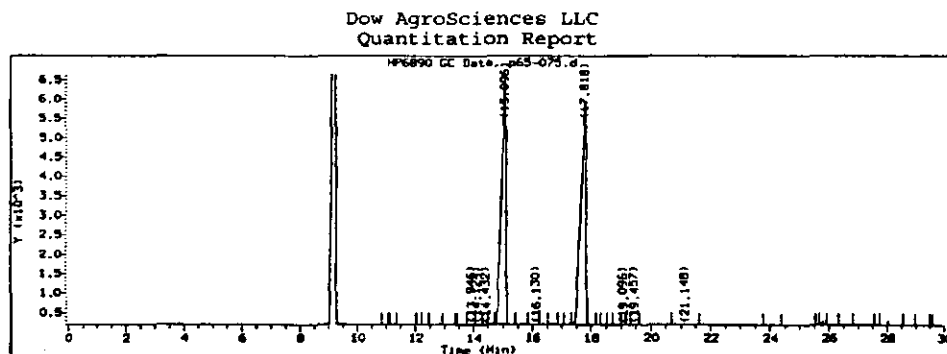
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 3

Representative Chromatogram of cis-1,3-Dichloropropene and trans-1,3-Dichloropropene Analytical Standard

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-075.d Page 1
Report Date 02/22/1999 11:48



Chromatographic conditions are listed in Section III.D.

Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

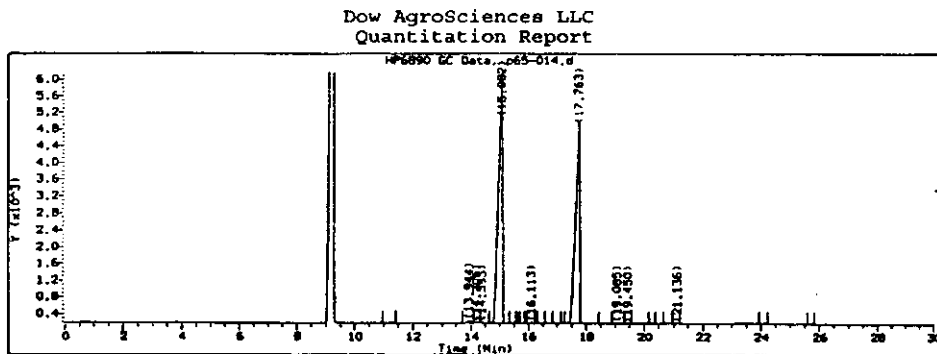
VII. FIGURES

Figure 4

Representative Chromatogram of Impurities in Telone Sample (TSN101516)

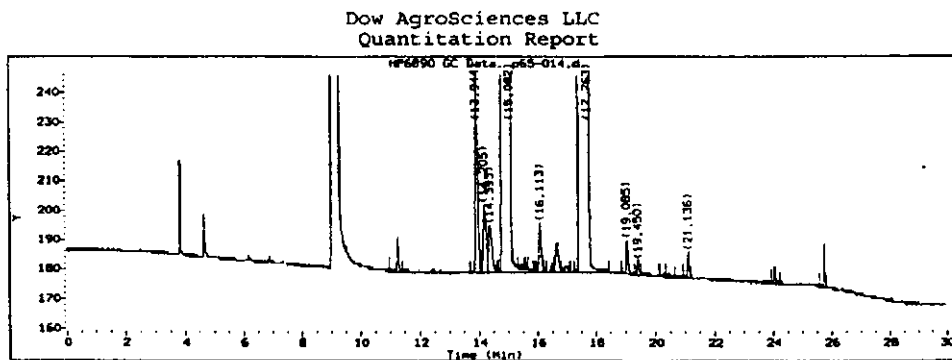
a) Chromatogram showing cis-1,3-D and trans-1,3-D

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-014.d Page 1
Report Date 02/26/1999 08:24



b) Expanded scale to show impurities

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-014.d Page 1
Report Date 08/11/1999 16:12



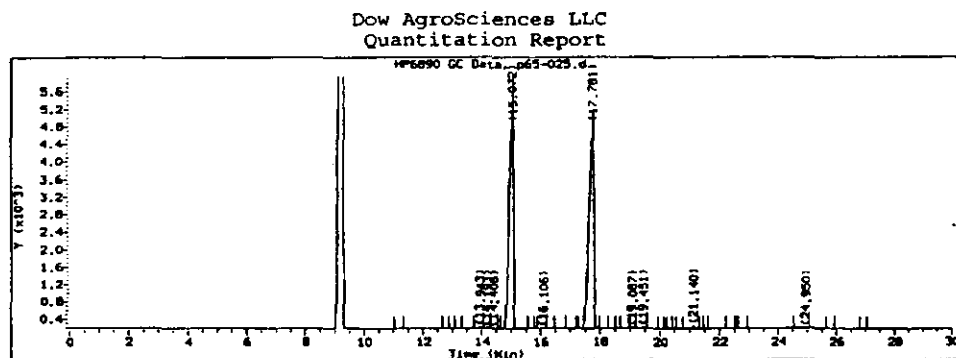
Chromatographic conditions are listed in Section III.D.
Components and approximate retention times are listed in Figure 3.

VII. FIGURES

Figure 5
Representative Chromatogram of Impurities in Telone Sample (TSN101496)

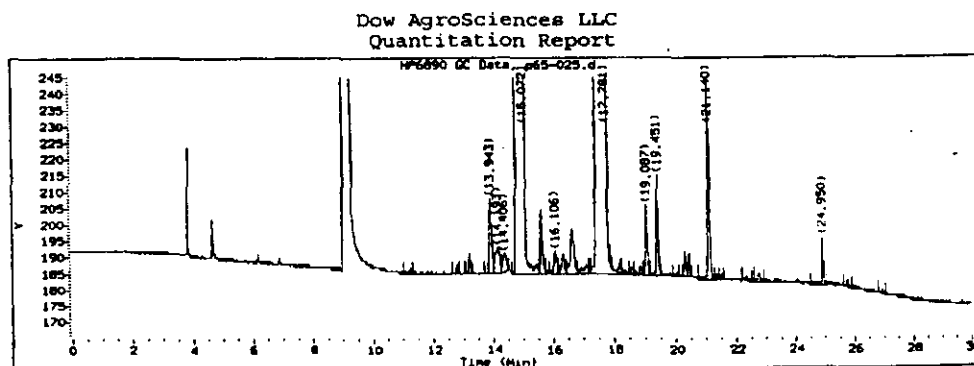
a) Chromatogram showing cis-1,3-D and trans-1,3-D

Data File: /var/chem/167gc055.1/98081.p/e0439p65.b/p65-025.d Page 1
Report Date 02/26/1999 08:25



b) Expanded scale to show impurities

Data File: /var/chem/167gc055.1/98081.p/e0439p65.b/p65-025.d Page 1
Report Date 08/11/1999 16:12



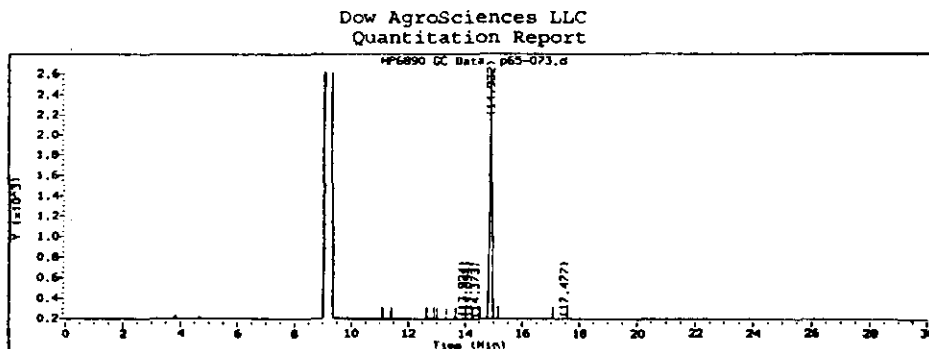
Chromatographic conditions are listed in Section III.D.
Components and approximate retention times are listed in Figure 3.

VII. FIGURES

Figure 6

Representative Chromatogram of cis-1,3-Dichloropropene (TSN100275)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-073.d Page 1
Report Date 02/22/1999 11:47



Chromatographic conditions are listed in Section III.D.

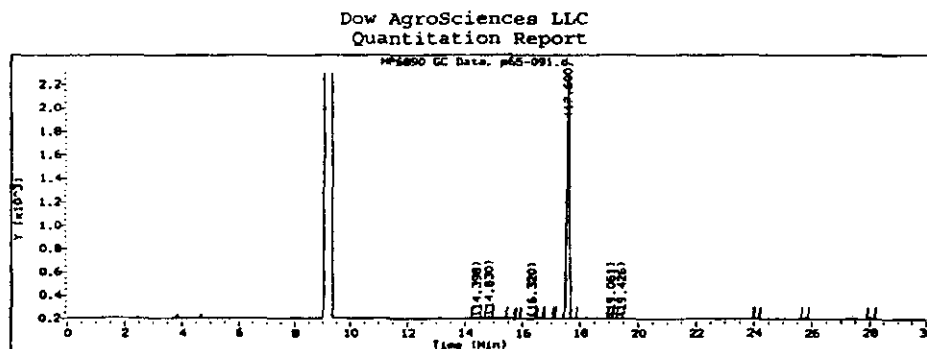
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 7

Representative Chromatogram of trans-1,3-Dichloropropene (TSN100276)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-091.d Page 1
Report Date 02/22/1999 11:51



Chromatographic conditions are listed in Section III.D.

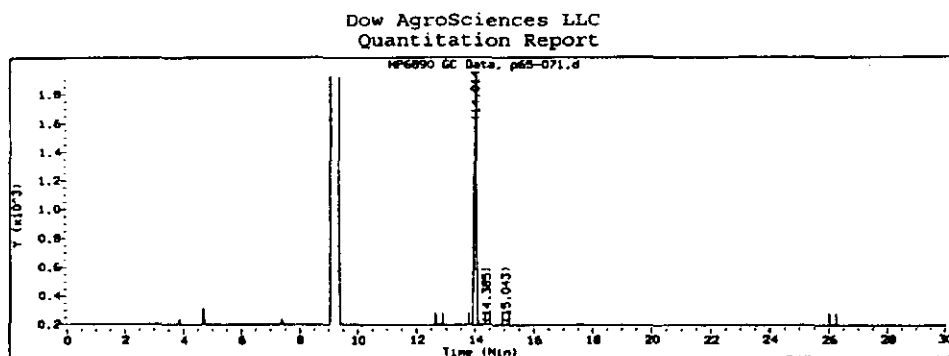
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 8

Representative Chromatogram of 2-Chloro-2-methylpentane (AGR238091)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-071.d Page 1
 Report Date 02/22/1999 11:47



Chromatographic conditions are listed in Section III.D.

Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

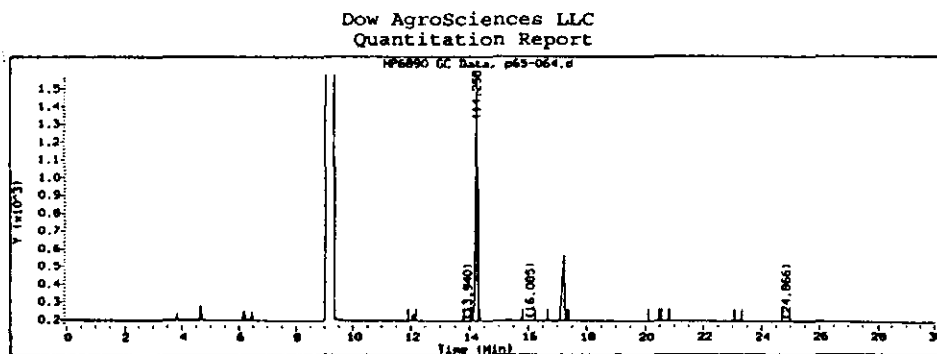
VII. FIGURES

Figure 9

Representative Chromatogram of 2-Chloro-4-methylpentane (TSN101687)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-064.d
Report Date 02/26/1999 08:31

Page 1



Chromatographic conditions are listed in Section III.D.

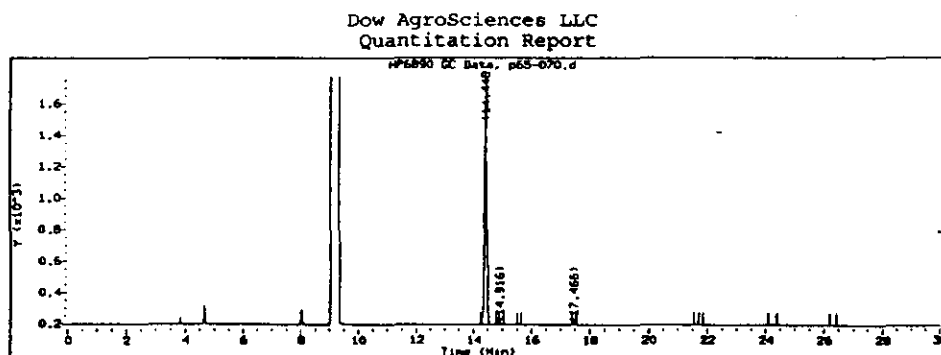
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 10

Representative Chromatogram of 2-Chloro-2,3-dimethylbutane (AGR238087)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-070.d Page 1
Report Date 02/22/1999 11:47



Chromatographic conditions are listed in Section III.D.

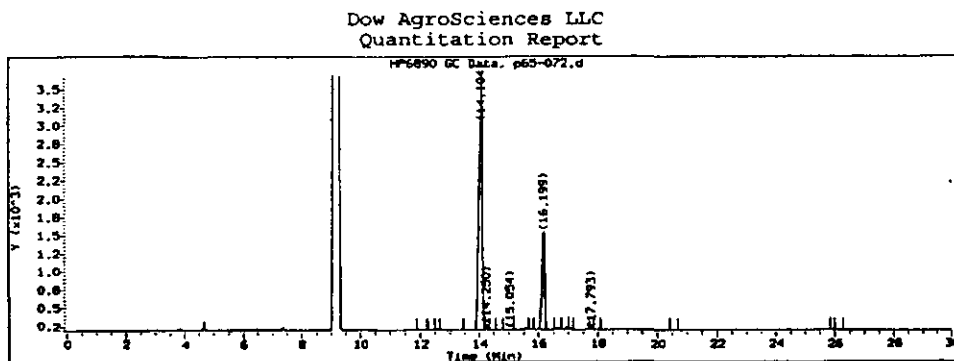
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 11

Representative Chromatogram of 3-Chloro-2-methylpentane (minor peak) and 2-Chloro-2-methylpentane (major peak) (TSN101695)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-072.d Page 1
Report Date 02/22/1999 11:47



Chromatographic conditions are listed in Section III.D.

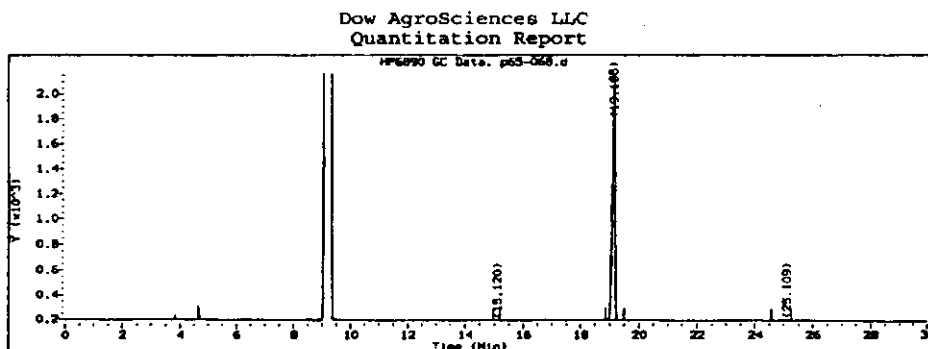
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 12

Representative Chromatogram of 1,3-Dichloropropane (AGR238090)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-068.d Page 1
Report Date 02/26/1999 08:32



Chromatographic conditions are listed in Section III.D.

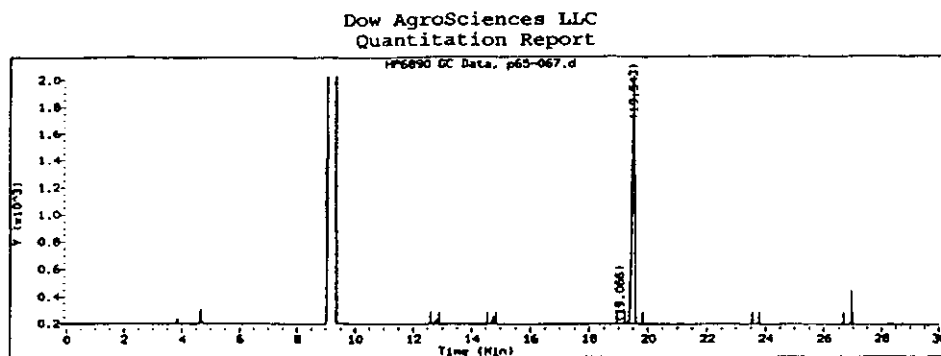
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 13

Representative Chromatogram of 1,2,2-Trichloropropane (AGR238089)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-067.d Page 1
Report Date 02/26/1999 08:32



Chromatographic conditions are listed in Section III.D.

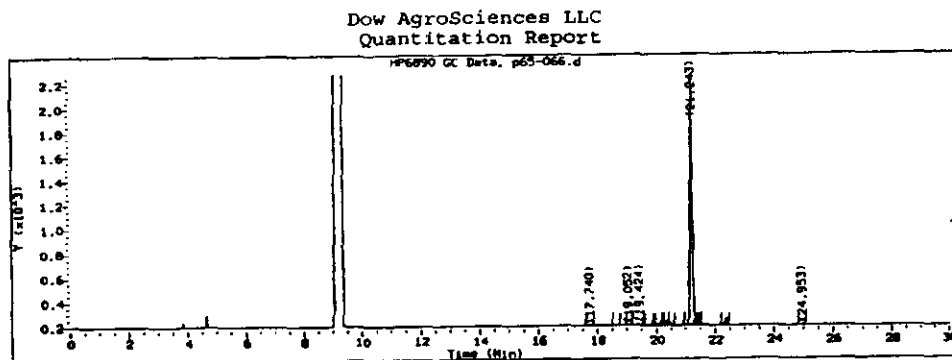
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 14

Representative Chromatogram of cis-1,3,3-Trichloropropene (AGR238088)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-066.d Page 1
Report Date 02/26/1999 08:32



Chromatographic conditions are listed in Section III.D.

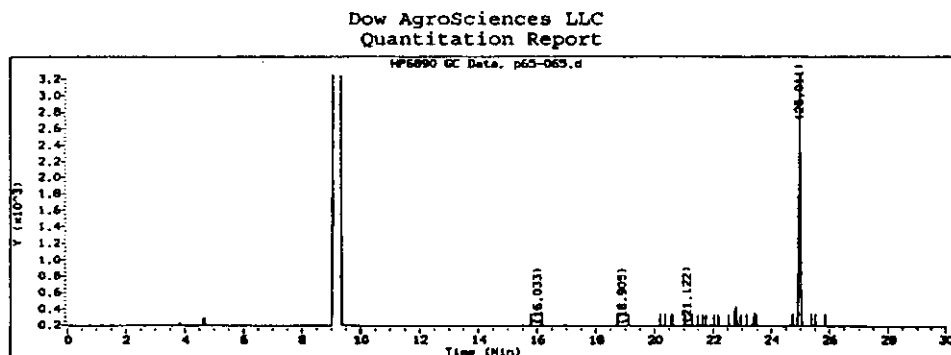
Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 15

Representative Chromatogram of trans-1,3,3-Trichloropropene (AGR238086)

Data File: /var/chem/167gc055.i/98081.p/e0439p65.b/p65-065.d Page 1
Report Date 02/26/1999 08:32



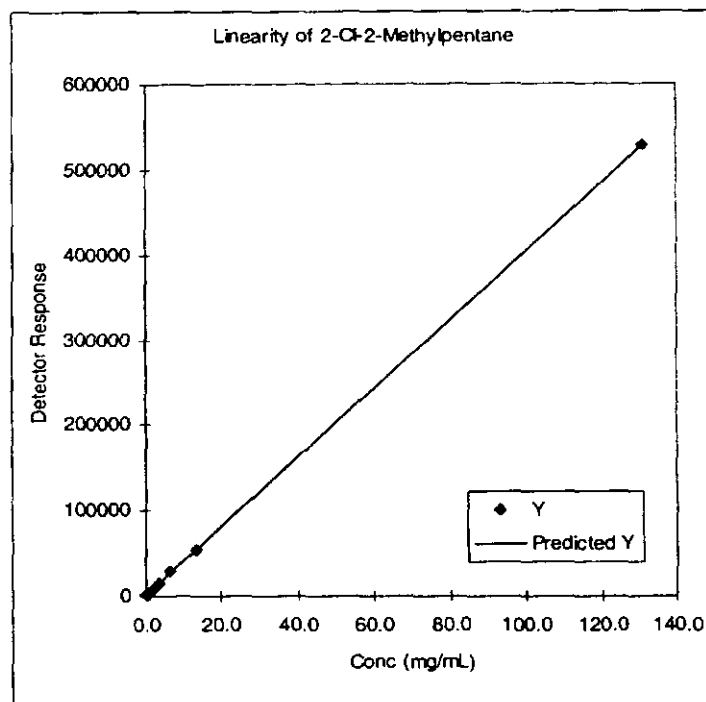
Chromatographic conditions are listed in Section III.D.

Component	Standard	Approx. Retention Time (min)
2-Cl-2-methylpentane	TSN101695, AGR238091	14.1
2-Cl-4-methylpentane	TSN101687	14.3
2-Cl-2,3-dimethylbutane	AGR238087	14.45
cis-1,3-dichloropropene	TSN100275	14.9
3-Cl-2-methylpentane	TSN101695	16.2
trans-1,3-dichloropropene	TSN100276	17.6
1,3-Dichloropropane	AGR238090	19.2
1,2,2-Trichloropropane	AGR238089	19.5
cis-1,3,3-trichloropropene	AGR238088	21.2
trans-1,3,3-trichloropropene	AGR238086	25.0

VII. FIGURES

Figure 16

Linearity of 2-Chloro-2-methylpentane



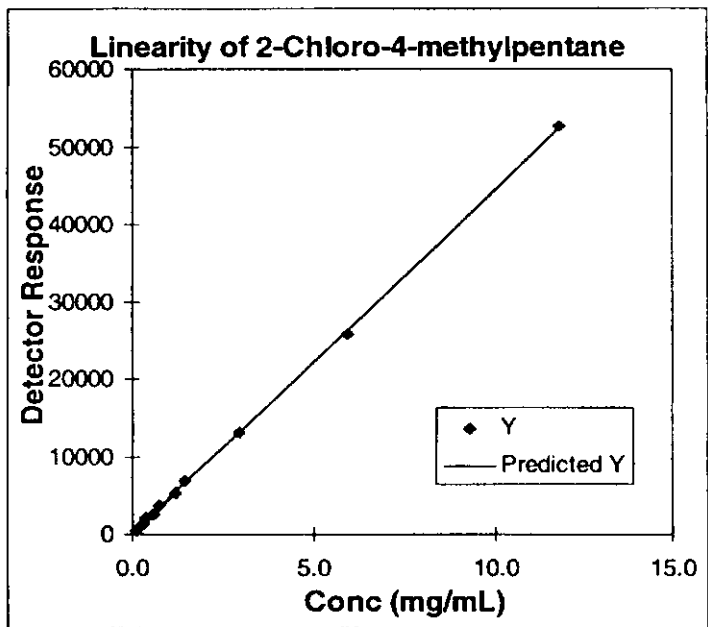
Concentration (mg/mL)	Detector Response
0.164	1082
0.328	1528
0.876	3862
1.751	7583
2.388	10371
3.283	14347
6.566	29826
13.133	54204
131.328	528663

Slope = 4018.863
 y-axis intercept = 1020.277
 Regression Coefficient = 0.99997
 Observations = 9

VII. FIGURES

Figure 17

Linearity of 2-Chloro-4-methylentane



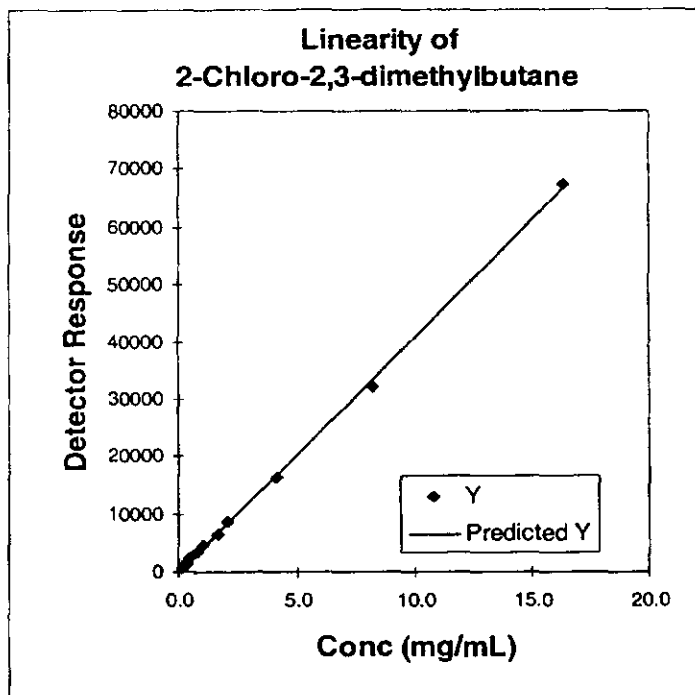
Concentration (mg/mL)	Detector Response
0.092	499
0.185	1024
0.296	1289
0.370	2015
0.591	2615
0.739	3661
1.183	5237
1.478	6980
2.957	13030
5.913	25854
11.827	52660

Slope = 4421.988
 y-axis intercept = 138.7981
 Regression Coefficient = 0.999779
 Observations = 11

VII. FIGURES

Figure 18

Linearity of 2-Chloro-2,3-dimethylbutane



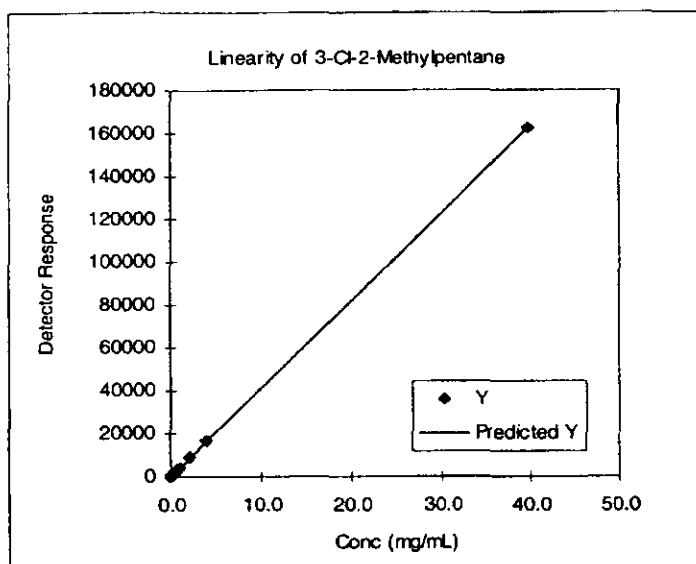
Concentration (mg/mL)	Detector Response
0.128	620
0.256	1263
0.409	1606
0.512	2481
0.818	3256
1.023	4560
1.637	6532
2.046	8717
4.092	16257
8.184	32235
16.369	67232

Slope = 4068.082
y-axis intercept = 40.65927
Regression Coefficient = 0.999454
Observations = 11

VII. FIGURES

Figure 19

Linearity of 3-Chloro-2-methylpentane

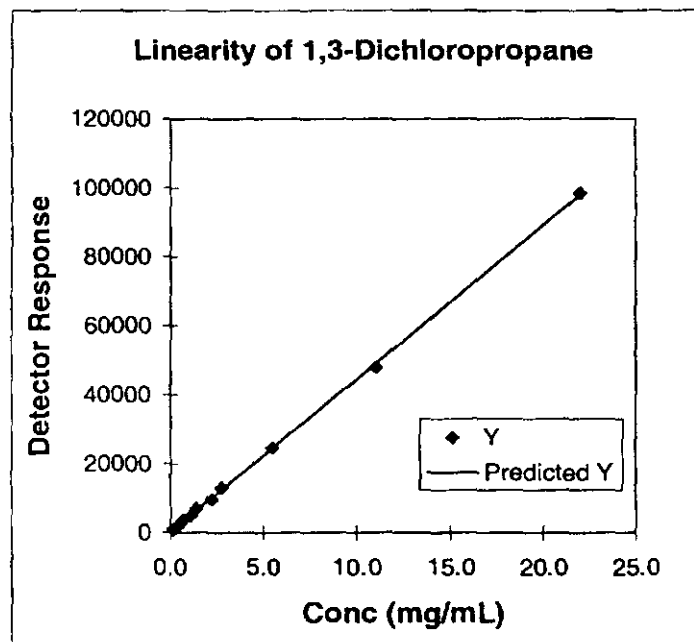


Concentration (mg/mL)	Detector Response
0.0497	372
0.0994	514
0.265	1199
0.530	2327
0.723	3179
0.994	4427
1.987	9453
3.974	16536
39.744	162456

Slope = 4079.806
y-axis intercept = 348.9076
Regression Coefficient = 0.999947
Observations = 9

VII. FIGURES

Figure 20
 Linearity of 1,3-Dichloropropane

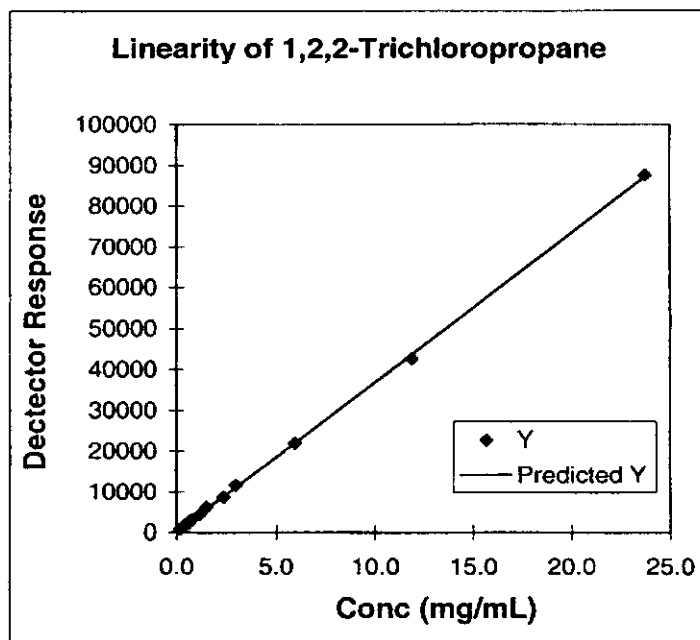


Concentration (mg/mL)	Detector Response
0.172	868
0.344	1854
0.550	2510
0.688	3566
1.101	4835
1.376	6954
2.201	9609
2.752	13102
5.504	24594
11.007	47978
22.014	98476

Slope = 4439.833
 y-axis intercept = 229.5268
 Regression Coefficient = 0.999693
 Observations = 11

VII. FIGURES

Figure 21
Linearity of 1,2,2-Trichloropropane

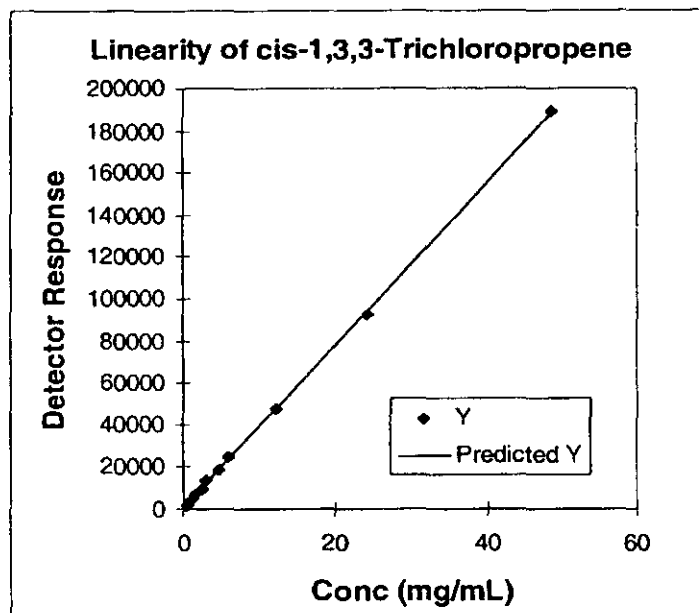


Concentration (mg/mL)	Detector Response
0.185	812
0.371	1628
0.594	2278
0.742	3107
1.187	4419
1.484	6125
2.374	8643
2.968	11601
5.936	21917
11.871	42678
23.742	87581

Slope = 3660.779
y-axis intercept = 220.875
Regression Coefficient = 0.999736
Observations = 11

VII. FIGURES

Figure 22
 Linearity of cis-1,3,3-Trichloropropene

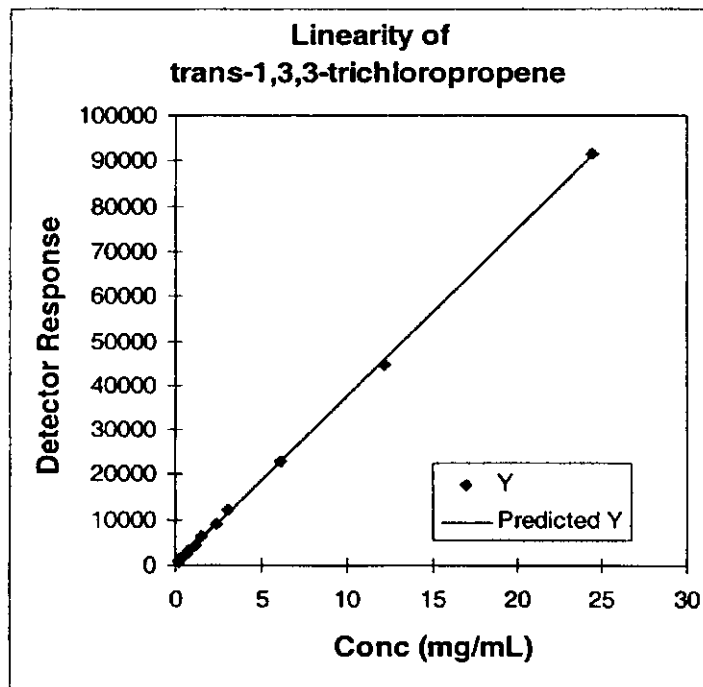


Concentration (mg/mL)	Detector Response
0.38	1701
0.76	3499
1.21	4682
1.51	6810
2.42	9445
3.03	13162
4.85	18485
6.06	24839
12.11	47389
24.23	92162
48.46	188834

Slope = 3870.231
 y-axis intercept = 416.5894
 Regression Coefficient = 0.999753
 Observations = 11

VII. FIGURES

Figure 23
 Linearity of trans-1,3,3-Trichloropropene



Concentration (mg/mL)	Detector Response
0.19	810
0.38	1718
0.61	2375
0.76	3338
1.22	4443
1.52	6463
2.44	8940
3.05	12164
6.10	23096
12.19	44670
24.39	91519

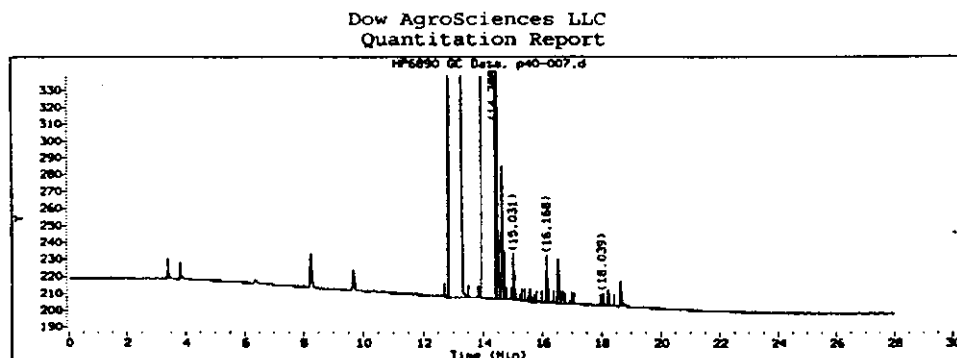
Slope = 3726.497
 y-axis intercept = 236.3419
 Regression Coefficient = 0.999712
 Observations = 11

VII. FIGURES

Figure 24

Representative Chromatogram using DB-1 Column for Separation
of Telone Impurities

Data File: /var/chem/167gc055.i/98081.p/e0439p39.b/p40-007.d Page 1
Report Date 08/11/1999 16:13



Instrument:	Hewlett-Packard 6890 or equivalent			
Column:	J&W DB-1 60 m x 0.25 mm 1.0 micron film			
Inlet:	Split			
Split Ratio:	38			
Purge flow:	1.2 mL/min			
Inlet Temperature:	150°C			
Oven Temperature:	Initial 50°C			
Initial Time:	3.0 min			
Oven Gradient:	Level	Rate °C/min	Final °C	Final Time (min)
	1	3.0	110	5
Detector:	TCD			
Detector Temperature:	155°C			
Back Inlet:	Constant Flow			
Carrier Flow:	72 mL/min			
Column Flow Rate:	1.9 mL/min			
Injection Volume:	1 µL			
Run Time:	28 min.			
Time to prepare and analyze one sample:	40 min			

VIII. APPENDIX

Analytical Method Summary: Impurities in Telone* II

A. Preparation of Standard Solution for Quantitation

Weigh approximately 100-200 mg of each impurity, recording the weight to the nearest 0.1 mg, into a 10 mL volumetric flask. Dilute to volume with ethyl acetate.

Transfer 1 mL of the solution to a 10 mL volumetric flask and dilute to volume with ethyl acetate, resulting in a standard solution containing each impurity at approximately 1-2 mg/mL.

B. Preparation of Telone Solution for Quantitation

Volumetrically pipet 4 mL of Telone II into a 10 mL volumetric flask, recording the weight to the nearest 0.1 mg. Dilute to volume with ethyl acetate. (Alternatively, the weight of the sample may be calculated using a density of 1.21 g/mL if 4 mL is volumetrically transferred to a 10 mL volumetric flask prior to diluting to volume.

C. Gas Chromatographic Conditions

Instrument:	Hewlett-Packard 6890 or equivalent				
Column:	J&W DB-1701 60 m x 0.32 mm 1.0 micron film				
Inlet:	Split				
Split Ratio:	38:1				
Purge flow:	1.2 mL/min				
Inlet Temperature:	150°C				
Oven Temperature:	Initial 40°C				
Initial Time:	2.0 min				
Oven Gradient:	Level	Rate °C/min	Final °C	Final	Time
				(min)	
	1	5.0	80	7.5	
	2	5.0	110	1.0	
	3	25.0	270	0	
Detector:	TCD				
Detector Temperature:	280°C				
Inlet:	Constant Flow				
Column Flow:	1.9 mL/min				
Injection Volume:	2 µL				
Run Time:	30 min				

*Trademark of Dow AgroSciences LLC

VIII. APPENDIX

D. Calculation

Response Factor for Calibration Standard:

$$Rf = \frac{A \times P}{B}$$

Where: Rf = response factor for standard
A = weight (mg), or concentration (mg/mL) of standard
P = purity of standard, expressed as decimal
B = peak area of standard in calibration standard

Concentration of Component in Sample:

$$\% \text{ Component} = \frac{Rf \times D \times E}{F}$$

Where: Rf = response factor for component in standard, calculated above
D = peak area of component in sample
E = multiplication factor (used to adjust for difference in dilution of standard and sample and to express value as weight percent)
F = sample weight, expressed in mg, or concentration (mg/mL)

Determination of Linearity:

The general equation for calculating a least square linear fit for the standard curve is as follows:

$$PR = mC + b$$

where PR = detector response for component
m = slope of the line.
C = concentration of component, in mg/mL.
b = y-axis intercept

For further details, refer to the main body of this report.