

## DOW CHEMICAL U.S.A. 21-51-147

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TELONE, DD, ACTIVITY RESIDES IN THE 1,3-D CONTENT

Dear Jack:

I've not been too successful in arranging a visit with you, as we both are out more than in it seems. As such, I thought I had better drop you a short letter.

First, I would like to restate the above subject. We have always contended, based on extensive lab and field data, that 1,3-D containing soil fumigants, are as effective as the amount of 1,3-D applied regardless of which material is applied Telone, Vidden D or Shell's DD.

An urgent aspect of discussing and reviewing this with you, is that we are discontinuing our Vidden D, and for the time being will have only Telone. Telone has specs for a minimum of 78% 1,3-D (cist trans isomers) whereas, Vidden D has specs of 55% 1,3-D. DD would appear to have specs similar to Vidden D as our and others analyses of it, always show it in the same range. This ratio 78:55 is approximately a 7:10 use ratio for Telone vs Vidden D or DD.

Above, I mention for the time being I say we will only handle Telone. I would predict that someplace in time, we will be forced to go to a 90+T 1,3-D product, as the EPA will not let usapply the amount of garbage (inadequate toxicology) that is applied with the 1,3-D. I call it garbage, because it is unlikely that anyone could justify the toxicology for the other numerous chlorinated aliphaties present. It's not that we are particulary concerned about their safety, but rather we can't justify the costs of their toxicological studies. As an example 50 gpa Vidden D, approximately 500 lbs/A, involve the application of 275 lbs 1,3-D, and 225 lbs. of 1,2-dichloropropage plus miscellany. In a 95% 1,3-D product, 50 gpa would equate to approximately 29 gpa or 290 lbs with 275 lbs. of 1,3-D, thats only 15 lbs of 1,2-D plus, or a 15 fold reduction in garbage. As to when, we yet have considerable "homework" to do, but that was the reason for sampling you the Telone II.

 $\Delta(\pi)$ EXHIBIT