

**ATTORNEY WORK PRODUCT
ATTORNEY-CLIENT PRIVILEGE**

2,4-Dichlorophenoxyacetic Acid(2,4-D)

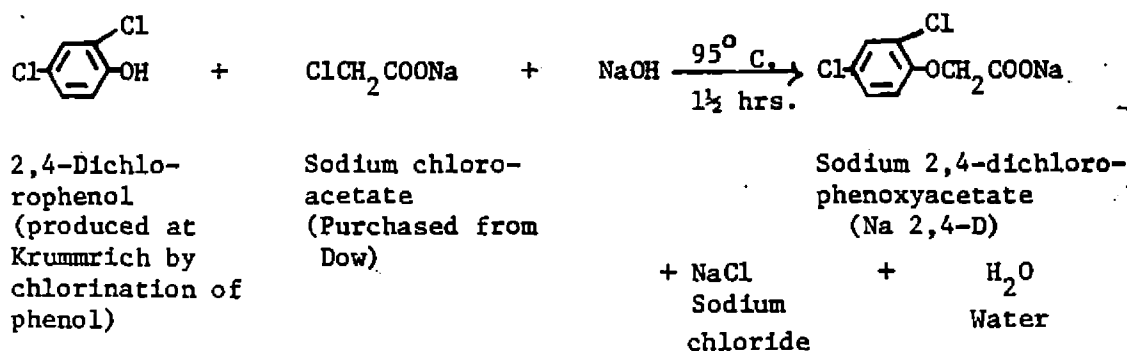
Ref: (1) Tent. Proc. for 2,4-D
Job No. 155-5018 4/4/46
(2) Description of Pro-
ducts-Nitro Plant 12/13/41

On December 6, 1948, the manufacture of 2,4-D was started in Building 79 of the Nitro plant at an estimated rate of 300,000 lbs. per month. This operation was of limited duration, since 2,4-D was regularly produced at the Krummrich and Queeny plants at that time. The process was essentially the same as that run at these plants.

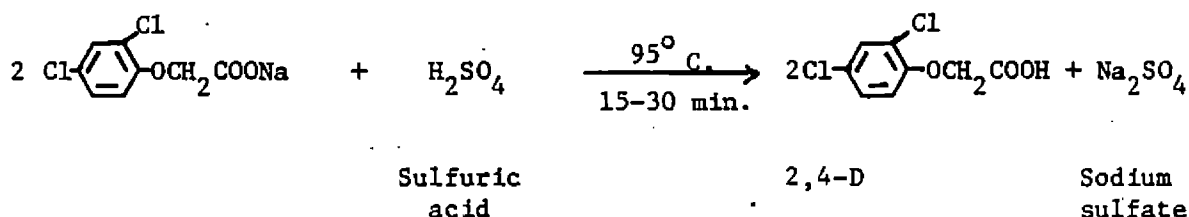
Chemical Reactions:

A. Basic Process

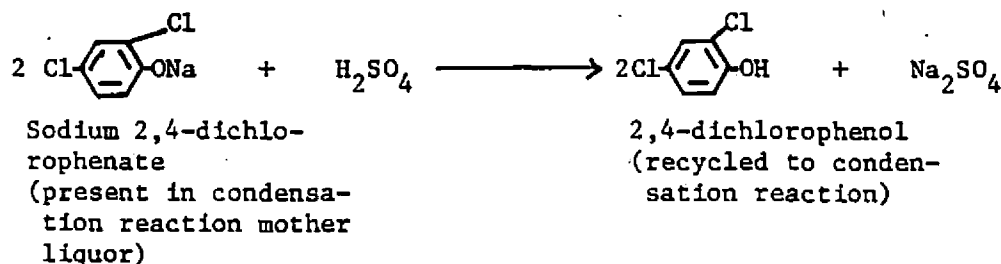
Step 1 - Condensation Reaction



Step 2 - Acidification



Step 3 - 2,4-Dichlorophenol Recovery

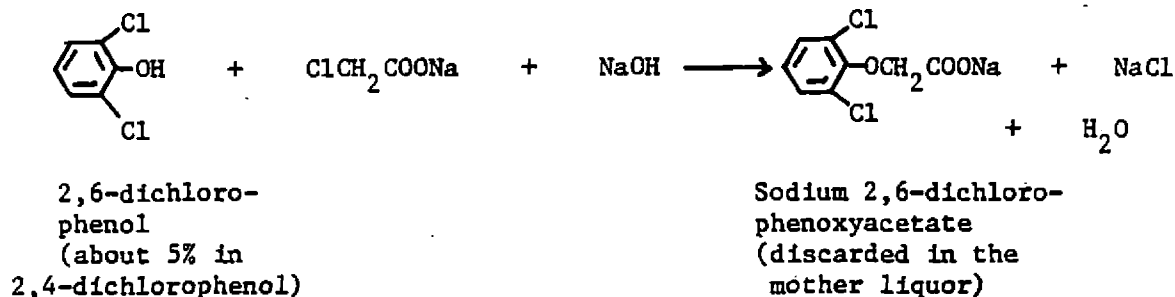


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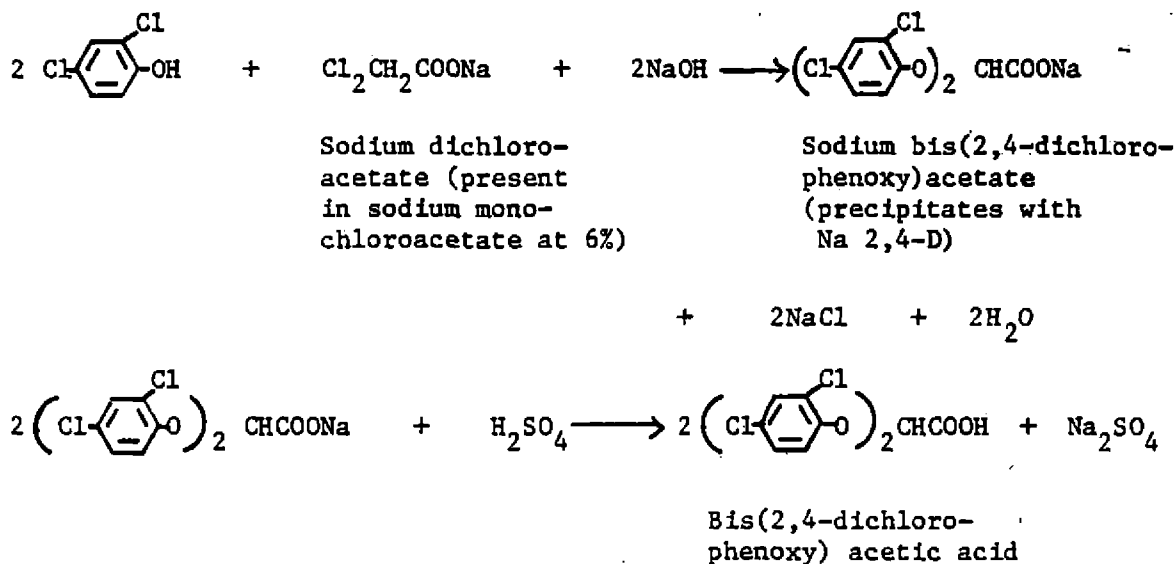
2,4-Dichlorophenoxyacetic Acid (2,4-D)

B. Impurity and By-product Formation

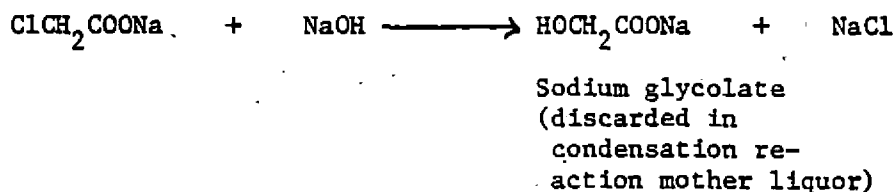
(1) Sodium 2,6-dichlorophenoxyacetate



(2) Bis(2,4-dichlorophenoxy)acetic acid and sodium salt



(3) Sodium glycolate



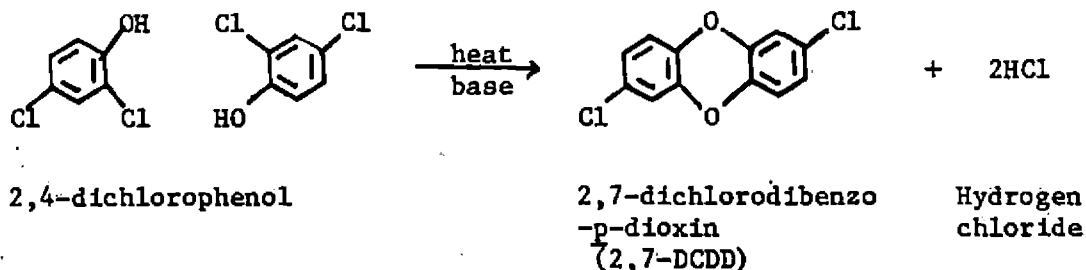
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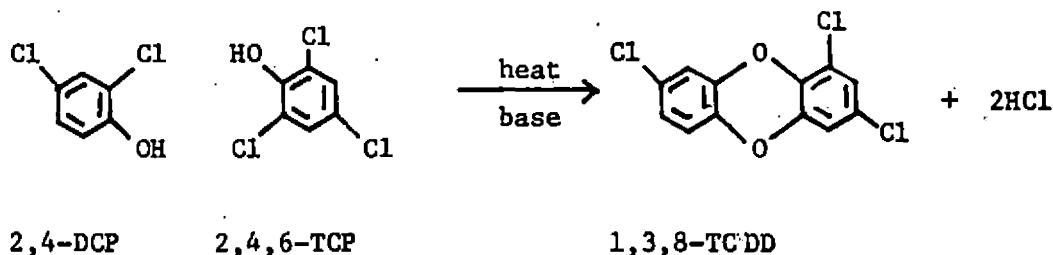
(4) Chlorinated dibenzo-p-dioxins formed as impurities*

The predominant chlorinated dioxins formed in the processes for 2,4-dichlorophenol and 2,4-D are as follows;

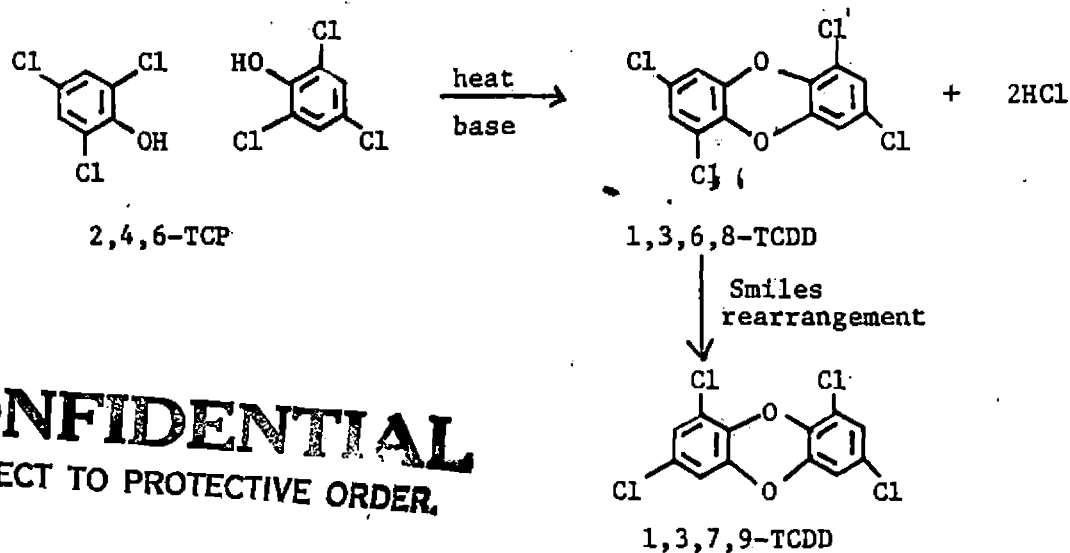
(a) 2,7-DCDD



(b) 1,3,8-TCDD



(c) 1,3,6,8-and 1,3,7,9-TCDD



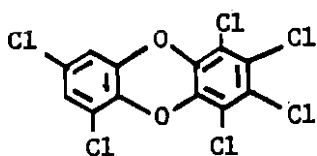
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* References: (1) Persamon Ser. Environ. Sci. (PSSID2) Vol. 5, p. 209-213 (1982)
(2) Journal of Chromatography, 217, 289-299 (1981)

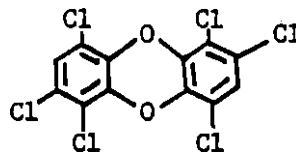
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2,4-Dichlorophenoxyacetic Acid(2,4-D)

(d) 1,2,3,4,6,8-and 1,2,4,6,7,9- HCDD (Chemistry not clear)



1,2,3,4,6,8-HCDD



1,2,4,6,7,9-HCDD

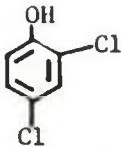
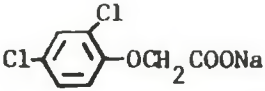
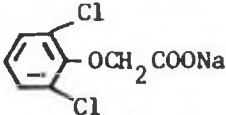
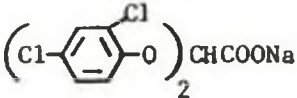
Others are formed in lesser degree, but no 2,3,7,8-TCDD
has been found.

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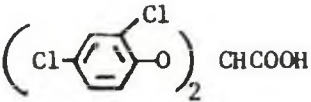
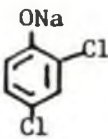
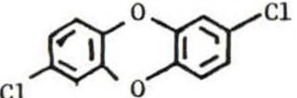
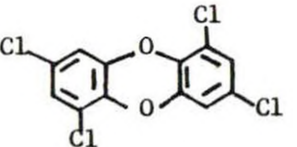
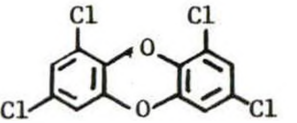
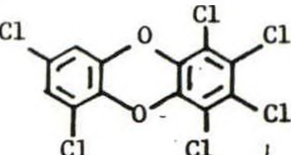
<u>Chemicals</u>	<u>Structural Formula</u>	<u>Empirical Formual</u>	<u>CAS No.</u>
A. <u>Starting Materials</u>			
2,4-Dichlorophenol		$C_6H_4Cl_2O$	120-83-2
Sodium chloroacetate	$ClCH_2COONa$	$C_2H_2ClO_2Na$	3926-62-3
Sodium hydroxide	$NaOH$	$HNaO$	1310-73-2
Sulfuric acid	H_2SO_4	H_2O_4S	7664-93-9
Decolorizing carbon	C	C	7440-44-0
Sodium chloride (used in wash of Na 2,4-D)	$NaCl$	$NaCl$	7647-14-5
B. <u>Isolated Intermediates</u>			
Sodium 2,4-dichlorophenoxyacetate (Na 2,4-D)		$C_8H_5Cl_2O_3Na$	2702-72-9
C. <u>By-products and Impurities of Toxicological Significance</u>			
Sodium 2,6-dichlorophenoxyacetate		$C_8H_5Cl_2O_3Na$	No CAS No.
Sodium bis(2,4-dichlorophenoxy)acetate		$C_{14}H_7Cl_4O_4Na$	No CAS No.

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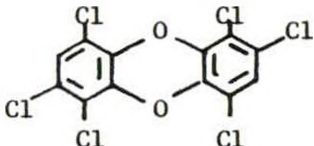
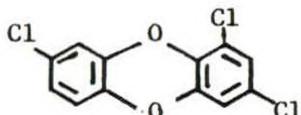
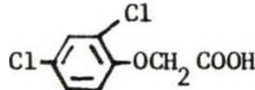
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<u>Chemicals</u>	<u>Structural Formula</u>	<u>Empirical Formula</u>	<u>CAS No.</u>
Bis(2,4-dichlorophenoxy) acetic acid		$C_{14}H_8Cl_4O_4$	No CAS No.
Sodium glycolate	$HOCH_2COONa$	$C_2H_3O_3Na$	2836-32-0
Sodium 2,4-dichlorophenate (NaDCP)		$C_6H_3Cl_2ONa$	3757-76-4
<u>Known Chlorinated Dioxin Impurities</u>			
2,7-Dichlorodibenzo-p-dioxin (2,7-DCDD)		$C_{12}H_6Cl_2O_2$	33857-26-0
1,3,6,8-Tetrachlorodibenzo-p-dioxin (1,3,6,8-TCDD)		$C_{12}H_4Cl_4O_2$	33423-926
1,3,7,9-Tetrachlorodibenzo-p-dioxin (1,3,7,9-TCDD)		$C_{12}H_4Cl_4O_2$	62470-53-5
1,2,3,4,6,8-Hexachlorodibenzo-p-dioxin (1,2,3,4,6,8-HCDD)		$C_{12}H_2Cl_6O_2$	58200-67-2

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<u>Chemicals</u>	<u>Structural Formula</u>	<u>Empirical Formula</u>	<u>CAS No.</u>
1,2,4,6,7,9-Hexachlorodibenzo -p-dioxin (1,2,4,6,7,9-HCDD)		$C_{12}H_2Cl_6O_2$	39227-62-8
1,3,8-Trichlorodibenzo-p-dioxin (1,3,8-TCDD)		$C_{12}H_5Cl_3O_2$	82306-61-4
D. <u>Product</u>			
2,4-Dichlorophenoxyacetic acid (2,4-D)		$C_8H_6Cl_2O_3$	94-75-7

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