

DP Barcode : D180279  
 PC Code No : 006317  
 EEB Out : AUG 27 1992

To: Linda DeLuise  
 Product Manager 52  
 Special Review and Reregistration Division (H7508W)

From: Douglas J. Urban, Acting Chief  
 Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 006317-6836  
 Chemical Name : 1,3-Dibromo-5,5-dimethylhydantoin  
 Type Product : Microbiocide  
 Product Name :  
 Company Name : Lonza Inc.  
 Purpose : List C Phase IV

Action Code : 602 Date Due : 8/18/92  
 Reviewer : Renee Lamb

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)	930760-02	S	72-2(A)	930760-22	Y	72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)	930760-03	S	72-3(A)	930760-08	Y	122-1(A)		
71-2(A)	930760-04	S	72-3(B)	930760-09	Y	122-1(B)		
71-3			72-3(C)	930760-10	Y	122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)	930760-20	Y	72-4(B)			124-2		
72-1(A)			72-5			141-1		
72-1(B)			72-6			141-2		
72-1(C)	930760-27	Y				141-5		

Y=Acceptable (Study satisfied Guideline)/Concur  
 P=Partial (Study partially fulfilled Guideline but additional information is needed)  
 S=Supplemental (Study provided useful information but Guideline was not satisfied)  
 N=Unacceptable (Study was rejected)/Nonconcur



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MEMORANDUM

Subject: 1,3-Dibromo-5,5-dimethylhydantoin (006317) Phase IV  
review for Lonza Inc.

From: Doug Urban, Acting Branch Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C) *Doug Urban 8/26/92*

To: Linda DeLuise PM 52  
Special Review and Reregistration Division. (H7508W)

Attached please find the Ecological Effects Branch Phase IV  
review for 1,3-Dibromo-5,5-dimethylhydantoin chemical number  
006317.

The new EEB policy (7/13/92) to support registration of  
industrial microbiocide uses now requires a limited set of data.  
Although EEB does not do a risk assessment on these uses, the  
data is required in order to determine precautionary labeling.  
EEB believes the proximity of these installations to marine and  
estuarine environments, thus the increased exposure to non target  
organisms, justifies requiring the additional data.

There were no new data submissions with this package. However,  
the following studies were mentioned in the Phase 3, and were  
used in the evaluation of data requirements for this chemical:

MRID NUMBER	CATEGORY	GUIDELINE
930760-03	Supplemental*	71-2(a)
930760-02	Supplemental*	71-1(a)
930760-04	Supplemental*	71-2(a)
930760-20	Core	72-1(a)
930760-27	Core	72-1(c)
930760-22	Core	72-2(a)
930760-08	Core	72-3(a)
930760-09	Core	72-3(b)
930760-10	Core	72-3(c)

\*Study can be ungraded to core.

If there are any questions contact Renee Lamb at 305-5294.

Date: 8/06/82  
 Case No: 3055  
 Chemical No: 006317 (D180279)

PHASE IV  
 DATA REQUIREMENTS FOR  
 ECOLOGICAL EFFECTS BRANCH

Data Requirements	Composition <sup>1</sup>	Use Pattern <sup>2</sup>	Does EPA Have Data To Satisfy This Requirement? (Yes, No)	Bibliographic Citation	Must Additional Data Be Submitted under FIFRA3(c)(2)(B)?
<b>6 Basic Studies In Bold</b>					
<b>71-1(a) Acute Avian Oral, Quail/Duck</b>	TGAI	F,G,M	Y <sup>3</sup>	930760-02*, 137088	Y <sup>4</sup>
71-1(b) Acute Avian Oral, Quail/Duck	(TEP)				
<b>71-2(a) Acute Avian Diet, Quail</b>	TGAI	F,G,M	Y <sup>3</sup>	930760-03*, 137087	Y <sup>4</sup>
<b>71-2(b) Acute Avian Diet, Duck</b>	TGAI	F,G,M	Y <sup>3</sup>	930760-04*, 137089	Y <sup>4</sup>
71-3 Wild Mammal Toxicity					
71-4(a) Avian Reproduction Quail					
71-4(b) Avian Reproduction Duck					
71-5(a) Simulated Terrestrial Field Study					
71-5(b) Actual Terrestrial Field Study					
<b>72-1(a) Acute Fish Toxicity Bluegill</b>	TGAI		Y	930760-20, 145356	N
72-1(b) Acute Fish Toxicity Bluegill	(TEP)				
<b>72-1(c) Acute Fish Toxicity Rainbow Trout</b>	TGAI	F,G,M	Y	930760-27, 145358	N
72-1(d) Acute Fish Toxicity Rainbow Trout	(TEP)				
<b>72-2(a) Acute Aquatic Invertebrate Toxicity</b>	TGAI	F,G,M	Y	930760-22, 145357	N
72-2(b) Acute Aquatic Invertebrate Toxicity	(TEP)				
<b>72-3(a) Acute Estu./Marl Tox Fish</b>	TGAI	F <sup>5</sup>	Y	930760-08, 409831-03	N
<b>72-3(b) Acute Estu./Marl Tox Mollusk</b>	TGAI	F <sup>5</sup>	Y	930760-09, 409831-01	N
<b>72-3(c) Acute Estu./Marl Tox Shrimp</b>	TGAI	F <sup>5</sup>	Y	930760-10, 409831-02	N

\* In Bibliographic Citation column indicates study may be upgradeable

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Date: 8/06/92  
 Case No: 3055  
 Chemical No: 006317 (D180279)

PHASE IV  
 DATA REQUIREMENTS FOR  
 ECOLOGICAL EFFECTS BRANCH

Must Additional  
 Data Be Submitted  
 under FIFRA3(c)(2)(B)?

Bibliographic  
 Citation

Does EPA Have  
 Data To Satisfy  
 This Requirement?  
 (Yes, No)

Use  
 Pattern<sup>2</sup>

Composition<sup>1</sup>

Data Requirements

72-3(d) Acute Estu/Mari Tox Fish (TEP)

72-3(e) Acute Estu/Mari Tox Mollusk (TEP)

72-3(f) Acute Estu/Mari Tox Shrimp (TEP)

72-4(a) Early Life-Stage Fish

72-4(b) Live-Cycle Aquatic Invertebrate

72-5 Life-Cycle Fish

72-6 Aquatic Org. Accumulation

72-7(a) Simulated Aquatic Field Study

72-7(b) Actual Aquatic Field Study

122-1(a) Seed Germ./Seedling Emerg.

122-1(b) Vegetative Vigor

122-2 Aquatic Plant Growth

123-1(a) Seed Germ./Seedling Emerg.

123-1(b) Vegetative Vigor

123-2 Aquatic Plant Growth

124-1 Terrestrial Field Study

124-2 Aquatic Field Study

141-1 Honey Bee Acute Contact

141-2 Honey Bee Residue on Foliage

141-5 Field Test for Pollinators

\* In Bibliographic Citation column. Indicates study may be upgradeable

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1. Composition: TGA= Technical grade of the active ingredient; PAIRA=Pure active ingredient, radiolabeled; TEP=Typical end-use product
2. Use Patterns: A=Terrestrial Food Crop; B=Terrestrial Feed Crop; C=Terrestrial Non-Food Crop; D=Aquatic Food Crop; E=Aquatic Non-Food Outdoor; F=Aquatic Non-Food Industrial; G=Aquatic Non-Food Residential; H=Greenhouse Food Crop; I=Greenhouse Non-Food Crop; J=Forestry; K=Outdoor Residential; L=Indoor Food; M=Indoor Non-Food; N=Indoor Medical; O=Indoor Residential; Z=Use Group for Site 00000
3. Data for one avian dietary study and one avian acute oral study (bobwhite quail preferred) are required for uses not requiring a risk assessment(F,G,M).
4. Additional data required to upgrade study to core. All avian studies are deficient as the percent active ingredient of the test material was not identified. See Data Evaluation Record.
5. Estuarine studies are required to support the following uses: once through water cooling systems, pulp/paper mills, secondary oil recovery injection water, and oil recovery drilling muds/packer fluids.

MRID: 93078 000

United States Environmental Protection Agency Washington, DC 20460		Form Approved : 12/21/89 OMB No. : 2070-0106 Approval Expires: 12/31/92							
<b>REREGISTRATION PHASE 3 CHEMICAL RESPONSE WORKSHEET</b>									
1.a. Company Name <b>LONZA INC          FAIR LAWN, NJ</b>	1.b. Company No. <b>006836</b>	2.a. Chemical No. <b>006317</b>	2.b. Chemical Name <b>Dibromo-5,5-dimethylhydantoin</b>						
		2.c. Case No. <b>3055</b>							
<b>Summary of Registrant's Phase 2 Response</b>									
3	4	5	6						
Guideline Reference Number	Name of Requirement	MRID Number Associated with Codes 1 and 6	Comply Codes Used in Phase 2 Response						
61-1	Chemical Identity	161208	1						
61-2(a)	Begin. mat. & mfg. proc	137709 149238 161208 149238 165354	1						
61-2(b)	Discussion of Impurities	161208	1						
62-1	Preliminary Analysis	145360	1						
62-2	Certification of limits	161208	1						
62-3	Analytical Method	145360 161208	1						
16 <input type="checkbox"/> Check here if registrant is submitting other information he or she believes supports reregistration.									
17 <input type="checkbox"/> Check here if registrant is submitting identification of adverse effects information other than summaries of studies listed above.									
<b>Phase 3 Response</b>									
	7	8	9	10	11	12	13	14	15
	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Reformulated Study Provided?	Will Do Study?	Will Cost Share?	Have/Use/Provide Data Compensation?	Amending to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
	Yes	Yes	Yes	Yes	Yes	Yes	Yes		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
18 Certification I certify that the statements that I have made on this form and all attachments therein are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.									
Signature <i>Joseph R. Robinson</i> (SIGNATURE)		Date <b>July 24, 1990*</b> (DATE)							
19 Contact <b>Joseph R. Robinson</b>		20 Phone <b>201 794-2433</b>							

\*Revised February 13, 1991 IF YOU HAVE ANY QUESTIONS OR OTHER CONCERNS ABOUT PHASE 3 PLEASE CALL 800-552-8879.

FEB 15 1991

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1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated with Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Reformatted Study Provided?	Will Do Study?	Will Cost Share?	Have/Will Provide Data Compensation?	Am Amending to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
63-2	Color	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-3	Physical State	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-4	Odor	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-5	Melting Point	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
63-6	Boiling Point			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
63-7	Density	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-8	Solubility	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-9	Vapor Pressure			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
63-10	Dissociation Constant		6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
63-11	Oct/Water partition Coef.		6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
63-12	pH	161208	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-13	Stability	* NOT FOUND	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-14	Oxidizing/Reducing Action	* NOT FOUND	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-15	Flammability			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-16	Explosibility		6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-17	Storage stability	* NOT FOUND	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
63-18	Viscosity			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-19	Miscibility			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
63-20	Corrosion characteristics			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
63-21	Dielectric breakdown volt		6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1

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1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated With Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Refor-matted Study Provided?	Will Do Study?	Will Cost Share?	Have/Will Provide Data Compensation?	Am Amending to Drop Use?	Corres-pondence Attached	Time Frame (Yrs.)
71-1(a)	Acute avian oral quail/duck	128162	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
71-2(a)	Acute avian diet. quail	137088 145353 84179 145355	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
71-2(b)	Acute avian diet duck	84525		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-1(a)	Fish toxicity bluegill	137090 128165	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-1(b)	Fish toxicity bluegill - TEP	142070 145356 145357		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-1(c)	Fish toxicity rainbow trout	137090	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-1(d)	Fish tox rainbow trout-TEP	128164 142069		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-2(a)	Invertebrate toxicity	139551 145358	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
		128166 145357 144968		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1

B



1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated with Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Reformulated Study Provided?	Will Do Study?	Will Cost Share?	Will Provide Data Compensation?	Am Amending to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
72-2(b)	Invertebrate toxicity - TEP	139091		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(a)	Estu/mari tox. fish	40993103	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(b) <del>b</del>	Estu/mari tox. mollusk	40993101	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(c) <del>c</del>	Estu/mari tox. shrimp	40993102	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(d)	Estu/mari tox. fish - TEP			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(e)	Estu/mari tox. mollusk - TEP			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-3(f)	Estu/mari tox. shrimp - TEP			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-4(a)	Early life stage fish			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-4(b)	Life cycle invertebrate			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-5	Life cycle fish			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
72-6	Aquatic org. accumulation			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
72-7(a)	Simul. field-aquatic orgs.			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
72-7(b)	Actual field-aquatic orgs.			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
81-1 *	Acute oral tox. rat	84175	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
		161229		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		137105		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
81-2	Acute dermal tox. rabbit/rat	84176	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
		137110		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		128161		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*See additional study page 10.

1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	HRIP Number Associated With Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Refor-matted Study Provided?	Will Do study?	Will Cost Share?	Have/ Util/ Provide Data Compen-sation?	Am Amending to Drop Use?	Corres-pondence Attached	Time Frame (Yrs.)
81-3	Acute inhal. tox rat	128167 137107	1,5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
81-4	Primary eye irritation-rabbit	84177 84173	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
81-5	Primary dermal irritation	165636 137108 128159 84172	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
81-6	Dermal sensitization	137109 128158 161228 84178 137460 128160	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
81-7	Acute delayed neurotox hen			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
82-1(a)	90-day feeding-rodent	* NOT FOUND	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
82-1(b)	90-day feeding-nonrodent		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
82-2	21-day dermal-rabbit/rat (28-day)			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
82-3	90-day dermal-rodent			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
82-4	90-day inhal.-rat			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2

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1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRIP Number Associated With Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Reformatting Study Provided?	Will Do Study?	Will Cost Share?	Have/Will Provide Data Compensation?	Am Amending to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
82-5(a)	90-day neurotox-hen			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
82-5(b)	90-day neurotox-mammal			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
83-1(a)	Chronic tox-rodent		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
83-1(b)	Chronic tox - non-rodent		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
83-2(a)	Oncogenicity - rat		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
83-2(b)	Oncogenicity-mouse		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
83-3(a)	Teratogenicity - rat	* NOT FOUND	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
83-3(b)	Teratogenicity - rabbit	164039	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
83-4	2-generation repro.-rat		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
84-2(a) *	Gene mutation-ames	91292	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
84-2(b) *	Struct. chrom. aberration	40348201	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
84-4 *	Other genotoxic effects (cld)	164038	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
85-1	General metabolism		5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
85-2	Dermal penetration			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
86-1	Domestic animal safety			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
122-1(a)	Seed germ/seedling emerg			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
122-1(b)	Vegetative vigor			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
122-2	Aquatic plant growth			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
123-1(a)	Seed germ/seedling emerg			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
123-1(b)	Vegetative vigor			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1

\*See additional studies page 10.

1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated with Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary provided?	Does Summary identify Adverse Effects?	Is Refor-matted study provided?	Will Do Study?	Will Cost Share?	Have/Will Provide Data Compens-ation?	Am Amending to Prop Use?	Corres-pondence Attached	Time Frame (Yrs.)
123-2	Aquatic plant growth			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
124-1	Terrestrial field			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
124-2	Aquatic field			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
133-3	Dermal passive dosimetry expo			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
133-4	Inhal. passive dosimetry expo			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
141-5	Field test for pollinators			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
160-5	Chemical identity	* NOT FOUND	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
161-1	Hydrolysis	158017	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
		161427		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		164035		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
161-2	Photodegradation-water	158017	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
		161427		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
162-3	Anaerobic aquatic metab.		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
162-4	Aerobic aquatic metab.		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
163-1	Leach/adsorp/desorption		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
164-1	Terrestrial field dissipation			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
164-2	Aquatic field dissipation		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
164-5	Long term soil dissipation			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
165-3	Accumulation - irrig crop			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
165-4	Bioaccumulation in fish		4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1

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1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055				
Summary of Registrant's Phase 2 Response				Phase 3 Response								
3	4	5	6	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated With Comply Codes 1 and 6	Comply Codes Used in Phase 2 Response	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Refined Study Provided?	Will Do Study?	Will Cost Share?	Reg/Will Provide Data Compensation?	Am Amending to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
165-5	Bioaccum-aquatic non-target			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
171-2	Chemical identity			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
171-3	Directions for use			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
171-4(a)	Nature of residue - plants			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(b)	Nature of residue - livestock			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(c)	Res. analyt. method - plant			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(d)	Res. analyt. method - animal			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(e)	Storage stability			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(i)	Mag. of res. food handling			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-4(j)	Mag. meat/milk/poultry/egg			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
171-5	Reduction of residues			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2

1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydant		2.c. Case No. 3055			
Phase 3 Response											
3	4	5	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	MRID Number Associated with Comply	Is Summary provided?	Does Summary Identify Adverse Effects?	Is Reformatted Study provided?	Will Do Study?	Will Cost Share?	Have/Will Provide Data Compen-sation?	Am Amending to Drop Use?	Corres-pondence Attached	Time Frame (Yrs.)
-- CROP --			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(K)	Cropfield Trials		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(L)	Processed Food		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-- CROP --			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(K)	Cropfield Trials		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(L)	Processed Food		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-- CROP --			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(K)	Cropfield Trials		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(L)	Processed Food		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-- CROP --			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(K)	Cropfield Trials		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(L)	Processed Food		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-- CROP --			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(K)	Cropfield Trials		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
171-4(L)	Processed Food		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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1.a. Company Name LONZA INC FAIR LAWN, NJ		1.b. Company No. 006836		2.a. Chemical No. 006317		2.b. Chemical Name Dibromo-5,5-dimethylhydantoin		2.c. Case No. 3055			
Phase 3 Response											
3	4	5	7	8	9	10	11	12	13	14	15
Guideline Reference Number	Name of Requirement	PRID Number Associated with Compoly Code	Is Summary Provided?	Does Summary Identify Adverse Effects?	Is Referred Study Provided?	Will Do Study?	Will Cost Share?	Will Provide Data Compensation?	Am According to Drop Use?	Correspondence Attached	Time Frame (Yrs.)
81-1	Acute oral tox. rat	137112	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2(a)	Gene mutation - Ames	137100	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2(a)	Gene mutation - Ames	137095	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2(b)	Struct. chrom. aberrations	137101	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2(b)	Struct. chrom. aberrations	137096	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2	Gene mutation - mouse lymphoma	137103	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-2	Gene mutation - mouse lymphoma	137098	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-4	Other genotoxic effects	137102	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
84-4	Other genotoxic effects	137097	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC 10 1990

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Dear Phase 3 Submitter:

Your Reregistration Phase 3 submission captioned above has been screened for compliance with PR Notice 89-3, and has been found unacceptable for further review. Due to its size we have not returned your submission to you, but the entire package is available for pickup at during normal business hours at the street address listed below.

We have listed below the major problem areas we identified in our screening of your package. The presentation of your submission was too confusing to allow us to itemize every problem. Please review the Phase 3 guidance package, particularly PR Notice 89-3, before resubmitting your package.

- o There must be a valid MRID in column 5 for each summary and reformatted version of a previously submitted study being submitted.
- o All summaries and reformat submitted must correspond to appropriate marks in columns 7 and 9 of the Phase 3 Response Worksheet.
- o Submit one copy of each document.
- o Each summary and reformat must have a title that begins with the words "Phase 3 Summary (or Reformat) of MRID NNNNNNNN...".
- o Each summary and reformatted study must have a Good Laboratory Practice compliance statement on page 3 signed by the study director, the study sponsor, and the study submitter. See 40 CFR 160.12.
- o Page 4 of each summary must bear a Certification of Access to Raw Data using the mandatory language specified in Section VIII(D) of PR Notice 89-3 and one of the two alternative forms of the Certification of Accuracy of the Summary and Adequacy of the Study defined in Section VIII(E) of PR Notice 89-3.

If your corrected resubmission of these documents is received within three weeks of the date of this letter, your Phase 3 response will still be accepted. If you have any questions about the basis for these rejections, or about what you

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must do to make these documents acceptable, please call (703)557-2363.

When you resubmit, identify your resubmission clearly as a "Phase 3 Resubmission" and submit it by mail to:

Reregistration Phase 3 Response  
US EPA: Office of Pesticide Programs  
PO Box 14890  
Silver Spring, MD 20911-4890

or by private courier or express company to:

Reregistration Phase 3 Response  
c/o Automated Sciences Group, Inc.  
Attn: Norman Spurling  
1010 Wayne Avenue, Suite 600  
Silver Spring, MD 20910

Sincerely,

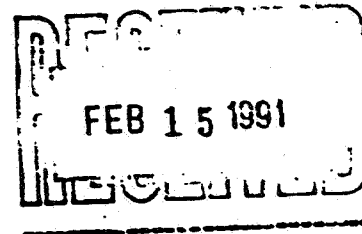
*Teresa L. Downs for*

John M. Carley, Manager  
Phase 3 In-Processing

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| 12

LONZA INC.  
Corporate Headquarters  
17-17 Route 208  
Fair Lawn, N.J. 07410

February 14, 1991



Mr. Norman Spurling  
Reregistration Phase 3 Response  
c/o AUTOMATED SCIENCES GROUP, INC.  
1010 Wayne Avenue, Suite 600  
Silver Spring, MD 20910

RE: HALOHYDANTOIN PHASE 3 REREGISTRATION DOCUMENTS

Dear Mr. Spurling:

Enclosed is one copy of the revised Phase 3 Reregistration response package for the following chemicals:

1. Bromo-3-chloro-5,5-dimethylhydantoin  
Chemical Number 006315
2. Dibromo-5,5-dimethylhydantoin,  
Chemical Number 006317
3. Dichloro-5,5-dimethylhydantoin  
Chemical Number 028501
4. Dichloro-5-ethyl-5-methylhydantoin  
Chemical Number 128826

The chemistry package submission for DANTOBROM<sup>TM</sup> represents data obtained on the commercial product as sold by Lonza. The process used for the manufacture of the product, as described in the package, results directly in the mixture of components given in the Confidential Statement of Formula. These components are not isolated separately, nor are they manufactured in purified form by Lonza.

Original Phase 2 submissions identified the separate chemical entities as the title compounds. These materials are not used by Lonza in the formulation of DANTOBROM<sup>TM</sup>. Halogen distribution in a mixed bromine/chlorine product of this type is an equilibrium process that results in a statistical distribution of all possible halogen isomers. Isolation of the pure components from this technical mixture is not a practical route to obtain the amounts required for a comprehensive analysis program.

Continued ....

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Mr. Norman Spurling  
Reregistration Phase 3  
Response

- 2 -

February 14, 1991

We intend to comply fully with all pertinent regulations but may require further guidance from EPA in this area.

We appreciate your patience in allowing us this extended deadline for the submission. We regret any inconvenience the previous submission may have caused.

Sincerely yours,

LONZA INC.



Joseph R. Robinson  
Associate Director  
Regulatory Services

JRR/ac

Enclosures

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### CHANGES MADE TO REREGISTRATION PHASE 3 WORKSHEET

CASE: 3055  
CHEMICAL: 006317  
COMPANY: 006836

CHANGES MADE BY: N. Spurling, ASG  
DATE: 2/19/91

Lonza resubmitted this worksheet in Feb. 1991 with a checkmark for correspondence in 63-5. The document that they submitted did not include this guideline; it included 63-6 Boiling Point. I have therefore deleted the correspondence check for 63-5 and added it to 63-6.

Lonza also reversed its guidelines for 72-3(b) and 72-3(c). I have corrected them.

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Phase 3 Submission Directory - Page 1

Company (006836): LONZA INC  
 Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline	Crop	Old MRID	Summary MRID	Reformat MRID
61-1		161208		
61-2(a)		161208		
61-2(b)		161208		
63-2		161208		
63-3		161208		
63-4		161208		
63-5		161208		
63-7		161208		
63-8		161208		
63-12		161208		
63-13				
71-1(a)		137088	93076002	
71-2(a)		137087	93076003	
71-2(b)		137089	93076004	
72-1(a)		137090	93076005	
		145356	93076020	
72-1(c)		139551	93076006	
		145358	93076027	
72-2(a)		139091	93076007	
		145357	93076022	
72-3(a)		40993103	93076008	
72-3(b)		40993101	93076009	
72-3(c)		40993102	93076010	
81-1		137105	93076011	
		161229	93076012	
81-2		84176	93076013	
		137110	93076025	
81-3		137107	93076014	
81-4		137108	93076015	
		165636	Rejected summary in 93076	
81-5		137109	93076017	
		161228	93076028	
		84172	93076026	
81-6		137460	Rejected summary in 93076	
84-2(b)		40348201	93076021	
81-1		137112	Rejected summary in 93076	
84-2(a)		137100	93076031	
		137095	93076029	
84-2(b)		137101	93076032	
		137096	93076024	
84-2		137103	93076034	
		137098	93076035	

Rejected Summaries in 93076

Phase 3 Submission Directory - Page 2

Company (006836): LONZA INC  
Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline	Crop	Old MRID	Summary MRID	Reformat MRID
84-4		137102 137097	93076030 93076033	

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Phase 3 Deficiency Listing - Page 1

Company (006836): LONZA INC  
 Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline/ Crop	Old MRID	S/R	Deficiencies Noted
61-1	161208	S	The summary checked in column 7 of the worksheet is not included in this package. The submitter has provided it in the package for another chemical within this case. <del>no</del> corrective action is required in package 93076
61-2(a)	161208	S	
61-2(b)	161208	S	
63-2	161208	S	Rejected in 93076
63-3	161208	S	
63-4	161208	S	
63-5	161208	S	
63-7	161208	S	
63-8	161208	S	
63-12	161208	S	
63-13		S	
71-1(a)	137088	S	
71-2(a)	137087	S	
71-2(b)	137089	S	

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Phase 3 Deficiency Listing - Page 2

Company (006836): LONZA INC  
Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline/ Crop	Old MRID	S/R	Deficiencies Noted
72-1(a)	137090	S	
72-1(a)	145356	S	
72-1(c)	139551	S	
72-1(c)	145358	S	
72-2(a)	139091	S	
72-2(a)	145357	S	
72-3(a)	40993103	S	
72-3(b)	40993101	S	
72-3(c)	40993102	S	
81-1	137105	S	
81-1	161229	S	
81-2	84176	S	
81-2	137110	S	
81-3	137107	S	

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Phase 3 Deficiency Listing - Page 3

Company (006836): LONZA INC  
 Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline/ Crop	Old MRID	S/R	Deficiencies Noted
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81-4	137108	S	
81-4	165636	S	} Rejected in 93076
81-5	137109	S	
81-5	161228	S	
81-5	84172	S	
81-6	137460	S	} Rejected in 93076
84-2(b)	40348201	S	
81-1	137112	S	} Rejected in 93076
84-2(a)	137100	S	
84-2(a)	137095	S	
84-2(b)	137101	S	
84-2(b)	137096	S	
84-2	137103	S	
84-2	137098	S	

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Phase 3 Deficiency Listing - Page 4

Company (006836): LONZA INC

Chemical (006317): Dibromo-5,5-dimethylhydantion

Guideline/ Crop	Old MRID	S/R	Deficiencies Noted
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84-4	137102	S	
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84-4	137097	S	
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**CHECKLIST FOR CONTENTS OF PHASE 3 AND R.E.D.s DATA PACKAGES TO SCIENCE BRANCHES**

The following checklist was developed to assist Chemical Reviewer Managers in assembling the Phase 3 review packages for science review. In the long run careful preparation of packages as presented below will save time for everyone. Please insure that all items are in order and that copies are readable.

Chemical: \_\_\_\_\_ Case #: 3055 Chemical #'s: \_\_\_\_\_  
 Chemical Review Manager: AMJ Phone: \_\_\_\_\_ Date sent: \_\_\_\_\_

**I. Phase 3 submissions Comments**

- a. Bean sheet and SMARTS form is included for each company and chemical #.....
- b. Low Volume/Minor Use BEAD analysis attached.....  No
- c. SRRD decisions of administrative waivers attached.....  No
- d. All correspondence is in proper order, readable, and all components are in the package (eg. If registrant is asking for waivers referenced in correspondence, is relevent material attached?).....
- e. Science branch response to Phase 2 (for appropriate branch only) is included.....
- f. Blowbacks of studies are attached (These blowbacks include all studies with summaries as well as studies claimed to be acceptable in Phase 3 correspondence or other material.....

**II. Use Profile**

- a. Written program definition on uses attached.....
- b. Aggregate LUIS report attached for: EEB  TOX  CBI   
 (Check one) EFGWB  OREB  CBII   
 (Report should be concise and include  
 1. Use patterns  
 2. Use categories within each use pattern  
 3. Restrictions  
 4. Maximum application rate, indicating clearly if it is per season or per year.
- c. General LUIS Report attached for: EEB  TOX  CBI   
 (Check one) EFGWB  OREB  CBII

**III. Product Chemistry Information (for EFGWB only)**

- a. Summaries for guidelines 63-2 thru 63-21 attached (These should not include manufacturing processes, determination of impurities, etc.).....

OR

Values for:	Value	OR	Reported Units
Density.....	_____		per _____
Vapor pressure.....	_____		per _____
Solubility (water & organic solvents)...	_____		per _____
Dissociation constant (pK <sub>a</sub> )...	_____		per _____
Octanol/water partition coefficient.....	_____		per _____
Other.....	_____		per _____

Company: 006836 LONZA INC  
 FAIR LAWN, NJ

Chemical: 006317 Dibromo-5,5-dimethylhydantion

Case: 3055 EPA Manager: Tom Myers

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
62-1	Preliminary Analysis		
	Comments: Data is required for the technical grade active ingredient. Refer to Subdivision D, Product Chemistry Guidelines.		
72-4(a)	Early life stage fish		
	Comments: A comply code was not marked on your Phase II response. Clarify your intentions on your Phase III response.		
72-4(b)	Life cycle invertebrate		
	Comments: See guideline 72-4(a).		
122-2	Aquatic plant growth		
	Comments: This requirement is reserved.		
165-5	Bioaccum-aquatic non-target		
	Comments: This requirement is reserved.		
171-4(a)	Nature of residue - plants		
	Comments: This requirement is reserved pending closer examination of the uses and the product chemistry data in Phases IV and V.		

Chemical: 006317  
Company: 006836

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
171-4(b)	Nature of residue - livestock		
	Comments: See guideline 171-4(a).		
171-4(c)	Res. analyt. method - plant		
	Comments: See guideline 171-4(a).		
171-4(d)	Res. analyt. method - animal		
	Comments: See guideline 171-4(a).		
171-4(e)	Storage stability		
	Comments: See guideline 171-4(a).		
171-4(i)	Mag. of res. food handling		
	Comments: See guideline 171-4(a).		
171-4(j)	Mag. meat/milk/poultry/egg		
	Comments: See guideline 171-4(a).		

General Comments For This Chemical:

Product chemistry data is required for each technical grade active ingredient being supported.

The following residue chemistry guidelines are reserved pending a closer examination of the uses and the product chemistry data in Phases IV and V.

Chemical: 006317  
Company: 006836

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GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
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GDLN Comments Continued:

171-4(1) Processed food  
171-6 Proposed tolerance  
171-7 Support for tolerance  
171-13 Anal. reference standard

Applicability of test material for cited studies to fulfill data requirements for individual active ingredients will be determined in Phase IV.

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Company: 006836 LONZA INC  
 FAIR LAWN, NJ

Chemical: 006317 Dibromo-5,5-dimethylhydantion

Case: 3055 EPA Manager: Tom Myers

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
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62-1 Preliminary Analysis

Comments: Data is required for the technical grade active ingredient. Refer to Subdivision D, Product Chemistry Guidelines.

72-4(a) Early life stage fish

Comments: A comply code was not marked on your Phase II response. Clarify your intentions on your Phase III response.

72-4(b) Life cycle invertebrate

Comments: See guideline 72-4(a).

122-2 Aquatic plant growth

Comments: This requirement is reserved.

165-5 Bioaccum-aquatic non-target

Comments: This requirement is reserved.

171-4(a) Nature of residue - plants

Comments: This requirement is reserved pending closer examination of the uses and the product chemistry data in Phases IV and V.

Chemical: 006317  
Company: 006836

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GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
171-4(b)	Nature of residue - livestock		
	Comments: See guideline 171-4(a).		
171-4(c)	Res. analyt. method - plant		
	Comments: See guideline 171-4(a).		
171-4(d)	Res. analyt. method - animal		
	Comments: See guideline 171-4(a).		
171-4(e)	Storage stability		
	Comments: See guideline 171-4(a).		
171-4(i)	Mag. of res. food handling		
	Comments: See guideline 171-4(a).		
171-4(j)	Mag. meat/milk/poultry/egg		
	Comments: See guideline 171-4(a).		

**General Comments For This Chemical:**

Product chemistry data is required for each technical grade active ingredient being supported.

The following residue chemistry guidelines are reserved pending a closer examination of the uses and the product chemistry data in Phases IV and V.

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Chemical: 006317  
Company: 006836

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GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
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## GDLN Comments Continued:

171-4(1) Processed food  
171-6 Proposed tolerance  
171-7 Support for tolerance  
171-13 Anal. reference standard

Applicability of test material for cited studies to fulfill data requirements for individual active ingredients will be determined in Phase IV.

LONZA INC.  
Corporate Headquarters  
17-17 Route 208  
Fair Lawn, N.J. 07410

July 24, 1990

Mr. Tom Myers  
Product Manager  
Reregistration Phase 3 Response  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
P.O. Box 14890  
Silver Spring, MD 20911-4890

MRID: NR 93078 999

**RE: PHASE 3 RESPONSE**

**COMPANY NAME:** Lonza Inc.  
**COMPANY NUMBER:** 6836  
**CASE NUMBER:** 3055  
**CASE NAME:** Bromo-3-Chloro-5,5-Dimethylhydantoin  
Dibromo-5,5-Dimethylhydantoin  
Dichloro-5,5-Dimethylhydantoin  
Dichloro-5-Ethyl-5-Methylhydantoin

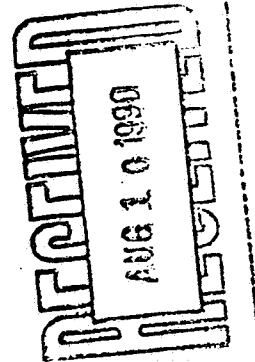
**CHEMICAL NUMBER:** 6315; 6317; 28501; 128826 *No FTB 1/2*

Dear Mr. Myers:

Lonza, by this letter, is agreeing to perform all of the necessary testing to maintain the following registrations:

<u>PRODUCT</u>	<u>EPA REG. NO.</u>
Glychlor Powder	6836-109
Bromchlor	6836-110
Glycoserve LAD	6836-111
Glycoserve	6836-112
Dantochlor RW	6836-113
Dantochlor	6836-114
Dantobrom RW	6836-115
Dantobrom S	6836-116
Dantobrom	6836-117
Dantobrom P	6836-118
Dantogard	6836-119
Glybrom RW-90	6836-120
Glybrom RW-92.5	6836-121
Glybrom RW-93.5	6836-122
Glybrom RW-95	6836-123
Glybrom RW-97.5	6836-124

Continued ....



July 24, 1990

Lonza has withdrawn our offer to cite the data currently being generated by Great Lakes Chemical Co. preferring to develop our own data package. All new data will be developed on dimethylhydantoin (DMH) as per the Agency's request and instruction. Per our conference call of July 20, 1990, C. Rice (EPA), S. Schatzow (Lonza attorney), and J. Conti (Lonza), all existing data meeting EPA "Adequacy Standards" conducted prior to July 1990 on any of the following:

- (A) dimethylhydantoin and/or its halogenated species and
- (B) ethylmethylhydantoin and/or its halogenated species could be used to satisfy requirements.

It is further stated that the chemistry package supplied on Dantobrom can be used to satisfy all component chemistry requirements since none of these chemicals are manufactured separately nor are they commercially available through Lonza.

It is the understanding of Lonza that this data package will satisfy:

- 1). All halogenated dimethyl and ethylmethyl hydantoins (EMH) i.e. 100% ethylmethyl hydantoin and 100% dimethylhydantoin and all combinations thereof.
- 2). All methylol derivatives of dimethyl and ethylmethyl hydantoin. Including compounds registered after November of 1984 to present i.e. Registration numbers 6836-111, 6836-112, 6836-119.
- 3). All esterified and ethoxylated derivatives of dimethyl and ethylmethyl hydantoin, currently there are no EPA registrations.

Based upon our evaluation for Phase 2 Reregistration, Lonza has determined our use group areas to be:

- 1). Aquatic non-food industrial
- 2). Aquatic non-food residential
- 3). Indoor food
- 4). Indoor non-food

Continued ....

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Mr. Tom Myers  
EPA

- 3 -

July 24, 1990

Lonza looks forward to meeting with the Agency at anytime if further discussion or clarification of the above listed points is required.

Sincerely yours,

LONZA INC.



Joseph R. Robinson  
Associate Director  
Regulatory Services

JRR/le

cc: Mr. Jay Ellenberger  
Generic Chemical Support Branch (H7508C)  
Special Review and Reregistration Division  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
1921 Jefferson Davis Highway  
Arlington, VA 20222

Dr. Chris Rice  
Office of Pesticide Programs (H7504C)  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, SW  
Washington, DC 20460

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