



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

FEB 7 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Great Lakes Chemical Corp.: Response to the Methyl Bromide Reregistration Standard: Product and Residue Chemistry Data Waiver Requests (No MRID #, CBRS #'s 9225 and 9269, Barcode No. D173004.

FROM: R. B. Perfetti, Ph.D., Chemist *R.B. Perfetti*
Reregistration Section
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C)

THRU: E. Zager, Chief *E. Zager*
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C)

TO: W. Burnam, Acting Chief
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

and

L. Rossi, Chief
Reregistration Branch
Special Review and Reregistration Division (H7508C)

Great Lakes Chemical Corp. has submitted waiver requests for a number of Product and Residue chemistry data requirements. These are discussed below;

Product Chemistry

The Registrant has requested data waivers for Guideline No.'s 63-10, -12, -13, -16, -17 and -20.

CBRS has no objections to data waivers for Guideline No.'s 63-10 (Dissociation Constant), -12 (pH), -13 (Stability) and -16 (Explodability).

Data are required for Guideline No.'s 63-17 (Storage Stability) and -20 (Corrosion Characteristics). (Note: With respect to 63-13, -16, -17 and 20, the Registrant is mistaken in his contention that gases are automatically exempt from these requirements.)

Residue Chemistry

With respect to the large number of requests for waivers for Residue Guideline No.'s 171-4 (e), (k) and (l), none of these are appropriate and should not be granted for the following reasons;

1) If no sample is stored for longer than 12 hours before analysis then no storage stability study is required and therefore a data waiver is moot. If samples are stored for longer periods then storage stability data will be required.

2) If and when crop group tolerances are established the data requirements for other crops in the group are dropped provided the use is the same for all of the crops in the group.

3) If no residue data is submitted on a crop (This includes dried foods.) it is considered unsupported and the commodity must be dropped from all labels and the corresponding tolerances (if they exist) will be revoked.

4) Processing studies are required for all rac's having processing fractions. The treated crop is to be processed and the fractions are analyzed to determine whether any concentration occurs during processing. This includes studies on potatoes, beans, soybeans, tomatoes, apples, grapes, field corn, sweet corn, sorghum, and oranges. The Registrant is referred to the Residue chemistry update for specifics as to what fractions are to be analyzed for each crop.

If you need additional input please advise.

cc: R. B. Perfetti, J. Burrell (PIB/FOD), Methyl Bromide Reregistration Standard File, Methyl Bromide Subject File, C. Furlow (PIB/FOD), Methyl Bromide Amended Use File, Circ. (7) and RF.