



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 9 1993

MEMORANDUM

SUBJECT: **Bromacil.** Request for Time Extension for submission of Guideline 171-4(k) and 171-4(l) Studies. Pineapple Field Residue Trials and Processing Study. Reregistration Case No. 0041. Chemical No. 012301. No MRID #. DP Barcode D183811. CBRS #10767.

FROM: Steven A. Knizner, Chemist *Steven A. Knizner*
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (H7509C)

THRU: Andrew Rathman, Section Head *AR*
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (H7509C)

TO: Mario Fiol, PM Team 73
Reregistration Branch
Special Review and Reregistration Division (H7508W)

DuPont Agricultural Products, in a letter dated 9/30/92, has requested an additional time extension to 9/94 for completion of Bromacil pineapple field residue trials. SRRD issued a generic DCI for Bromacil (9/30/91) requiring the submission of Bromacil pineapple field residue (171-4(k)) and processing residue data (171-4(l)) by 9/30/93.

CBRS recommended for, and SRRD granted on 4/9/92 (L. Rossi), a 6 month time extension (to 3/94) for the 171-4(k) study and a 12 month extension (to 9/94) for the 171-4(l) study.

DuPont justifies its current request for a 6-month time extension for field residue trial data by stating that the processing study is part of the field trial protocol, and they had expected to write only one report covering both the field residue trial and associated processing study.

CBRS Response: CBRS finds no scientific reason supporting an additional time extension for completion of the pineapple field residue trial data (171-4(k)).



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DuPont has also requested a 12-month time extension for completion of the nature of the residue study in pineapples (171-4(a)), from 9/93 to 9/94. The registrant justifies this request by noting that pineapple is a two-year crop, and final samples will not become available for analysis until 2/94.

CBRS Response: CBRS fails to understand why the registrant did not request a time extension for the pineapple 171-4(a) study concurrent with their earlier requests for time extensions of the 171-4(k) and 171-4(l) studies. Nonetheless, because samples for analysis will not be available until 2/94, the request for a time extension to 9/94 seems reasonable.

CBRS recognizes that the granting of time extensions is under the purview of SRRD.

cc: Bromacil S.F., circ., R.F., Reg. Std. File, S.Knizner
RDI: A.Rathman, 2/2/03 M.Metzger, 2/8/93 E. Zager, 2/8/93
H7509C:CBRS:CM#2:305-6903:SAK:sak:Bromacil.tme:2/1/93