SUBJECT: Product Chemistry Review of Halobrom (RR Case#3055, Phase 4)

FROM: Alfred Smith, Chemist
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REGISTRANT: Ameribrom, Inc.
DP BARCODE: D204589
EPA REG.#: 8622-25
CHEMICAL: 1-Bromo-3-chloro-5,5-dimethylhydantoin (BCDMH; Halobrom)
PCC NO: 006315

INTRODUCTION

The registrant has submitted Series 62 product chemistry studies in support of the Phase 4 reregistration of Bromochlorodimethylhydantoin (BCDMH; Halobrom). The studies are discussed below.

SERIES 62: Analysis and Certification of Product Ingredients (MRID 43219001)

62-1: Preliminary Analysis of Product Samples
The analysis of product samples is performed by an iodometric titration procedure (Method No. 100-170/132E, dated 11/89). Bromine and chlorine containing components which are present in Halobrom technical grade (TGAI) are determined by this procedure. For a discussion of the results of the analyses, see Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.170 for the Halobrom technical product (TGAI). No additional information is needed.

62-2: Certification of Ingredient Limits
For a discussion of the certification of the ingredient limits, see Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.175 for the TGAi. No additional information is needed.
62-3: Analytical Methods to Verify Certified Limits

Adequate analytical methods are submitted to verify the certified limits of the TGA1. For a discussion of the methods and the validation, see 62-1 above and the Confidential Appendix.

The information submitted satisfies the requirements of 40 CFR 158.180 for the TGA1. No additional information is needed.

SUMMARY

The product chemistry studies submitted satisfies the requirements of Series 62 (40 CFR 158.170, 158.175, and 158.180.)

ATTACHMENT: Confidential Appendix
Page 3 is not included in this copy.
Pages _____ through _____ are not included.

The material not included contains the following type of information:

___ Identity of product inert ingredients.
___ Identity of product impurities.
___ Description of the product manufacturing process.
___ Description of quality control procedures.
___ Identity of the source of product ingredients.
___ Sales or other commercial/financial information.
___ A draft product label.
___ The product confidential statement of formula.
___ Information about a pending registration action.
___ FIFRA registration data.
___ The document is a duplicate of page(s) ______.
___ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.