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

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Response to the Lithium Bromacil Reregistration  
Standard: Residue Chemistry Data Waiver Requests ( No  
MRID #, CBRS # 10,349, Barcode: D181340).

FROM: R. B. Perfetti, Ph.D., Chemist *R. B. Perfetti*  
Reregistration Section 1  
Chemistry Branch II: Reregistration Support  
Health Effects Division (H7509C)

THRU: W. Smith, Ph.D., Acting Section Head *W. Smith*  
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Chemistry Branch II: Reregistration Support  
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TO: Lois Rossi, Chief  
Reregistration Branch  
Special Review & Reregistration Division (H7508W)

and

E. Saito, Chief  
Chemical Coordination Branch  
Health Effects Division (H7509C)

Du Pont has asked that RSCB waive the Residue Chemistry data requirements for Lithium bromacil based on the fact that data on bromacil acid would suffice for the salt. REFS indicates that Lithium bromacil is used only on citrus. CBRS concludes that data on bromacil acid will be translated to Li bromacil for the following Residue Chemistry Guideline topics; Nature of the Residue in Plants and Animals (171-4 a and b), Analytical methods, plants and animals (171-4 c and d), Storage Stability (171-4 e) and Processing Studies (171-4 k) and therefore these requirements can be waived. In order that a conclusion that the magnitude of the residue situation in citrus is the same when formulations of Li bromacil are applied as when bromacil acid is



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applied, limited bridging field trials on citrus utilizing Li bromacil are required. This Guideline topic cannot be waived.

HED has also assumed responsibility for rotational crop guidelines 165-1 and -2. The Registrant should be informed that data on bromacil acid for 165-1 (and 165-2, if needed) will suffice for Li bromacil.

If you need additional input please advise.

cc: RBP, Bromacil Reregistration Standard File, Bromacil Subject File, Circ. and RF.