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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Bromacil Reregistration. Du Pont's 2/2/93 response [Series 61 data for Bromacil Technical; 012301] to the Bromacil Data Call-In [DCI] of 9/91. MRID 426484-01. CBRS 11379. Barcode D188192. Rereg Case 0041.

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Recommendation

Additional data are required for guideline 61-1 and 61-2; the 61-3 data for technical bromacil are acceptable.

Conclusions

1. The current disclosure of ingredients was incomplete and was not provided on the GLN 61-1 required EPA Form 8570-4.
2. The current information provided on the starting materials and on the manufacturing process does not satisfy the GLN 61-2 requirements.
3. The discussion of the formation of impurities satisfies the GLN 61-3 requirements.



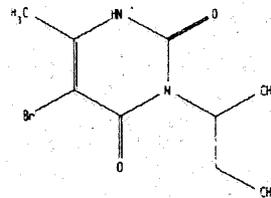
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Detailed Considerations

On 02/02/93, in response to the 9/91 DCI, Dupont Agricultural Products submitted Series 61 product chemistry for technical bromacil in their Report No. AMR 2463-92 dated 10/13/92. The chemical structure for bromacil is given below.

61-1. Product Identity and Disclosure of Ingredients

Refer to the Confidential Appendix.



The information provided is not adequate to satisfy this requirement. The registrant must also provide CAS Registry Numbers and nominal concentrations for all components, as well as the certified lower limit for the active ingredient. If the, "% Maximum", given for all components are the Upper Limits, they must also be certified. Finally, all these data must be submitted on EPA Form 8570-4, and closure specified thereon.

61-2. Description of Starting Materials and Manufacturing Process

Refer to the Confidential Appendix.

The information provided is not adequate to satisfy this requirement. The registrant must also provide the name and address of the manufacturer or producer of each starting material, as well as the brand or trade name. The additional pages which are missing from several raw material specifications are also required. Finally, a description of measures taken to assure the quality of the final product, including procedures involving the equipment used, must be submitted.

61-3. Discussion of the Formation of Impurities

Refer to the Confidential Appendix.

The information provided satisfies this requirement.

cc [w/ CBI]: KWD, Bromacil Reg. Std. File, SF, RF

cc [w/o CBI]: Circ

RD/I LCheng 6/24/93; MSMetzger 6/28/93

H7509C:CBRS:CM#2:RM804B:305-7886:KDockter/Kd:6/28/93

RIN 6995-94

BROMACIL REVIEW

Page is not included in this copy.

Pages 4 through 5 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.