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

JUN 26 1991

MEMORANDUMOFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: Chlorine Dioxide and Sodium Chlorite.
Interchangeability of Data for Reregistration
Chemistry Branch #7434 - D158753

From: Jane S. Smith, Chemist
Chemistry Branch II - Reregistration Support
Health Effects Division (H7509C)

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

To: Betty Crompton
Accelerated Reregistration Branch
Special Review and Reregistration Division (H7508W)

BIO-CIDE International, Inc. is requesting the Agency clarify the acceptability of using toxicity data developed using sodium chlorite as the tested compound to support chlorine dioxide for reregistration purposes.

Sodium chlorite is used in all types of food processing, food handling, food storage, for surface treatments, in human drinking water systems, etc. Chlorine dioxide has the same uses as sodium chlorite plus eating establishments, household/domestic dwellings, hatcheries, flour mills and storage areas, farm animals, etc.

CBRS Comments

Relative to CBRS, the data in support of the product chemistry requirements (Guidelines 61-1 thru 63-21) must be submitted for each chemical. These data are not interchangeable. Relative to the residue chemistry requirements (Guideline 171-4 series), a decision on the interchangeability of the data must be reserved until Phase IV (and possibly Phase V) pending review of the Phase III submission(s). Concerning the acceptability of using sodium chlorite toxicity data to support chlorine dioxide, we assume TOX will make that decision since it is within their purview.

cc: Subject file, Reading file, JSmith, List D File, Circ,
FOD/PIB (C. Furlow)

RD1: ARRathman, 06/24/91; EZager, 06/24/91.

H-7509C:CBRS:JSS:jss(24(c),ph4-51/clo2):CM#2:Rm810F:5/21/91.

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