MEMORANDUM

Subject: "53201; 081501. Product chemistry data requirements for methyl bromide and chloropicrin. RCB #529,530"

FROM: Michele L. Loftus, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Geraldine Werdig, PM-50
Registration Division (TS-767)

Residue Chemistry Branch has been asked to comment on the proposal by Great Lakes Chemical Corporation to submit Product Chemistry data for four products containing methyl bromide and/or chloropicrin, and to extrapolate from these data to 18 other registered products that contain these two active ingredients in order to satisfy Product Chemistry data requirements. Great Lakes Corporation proposes to submit Product Chemistry data on the four products listed below.

Meth-O-Gas, 100% methyl bromide. Registered as manufacturing-use product and end-use product.

Brom-O-Gas, methyl bromide (active ingredient), 2% chloropicrin. Registered as an end-use product.

Terr-O-Gas 67, methyl bromide (active ingredient). Registered as an end-use product.

Brom-O-Sol, methyl bromide (active ingredient). Registered as an end-use product.

RCB requires Product Chemistry data to be submitted for all technical and manufacturing use products as specified in 40CFR §158.108, §158.110, §158.112, and §158.120. Thus, RCB recommends against the aforementioned proposal by Great Lakes Corporation with respect to technical and end-use products containing methyl bromide and/or chloropicrin.
Conclusions Recommendation

RCB recommends that Great Lakes Corporation be required to submit Product Chemistry data as specified in 40 CFR §158.108, §158.110, §158.112, and §158.120 for all registered technical and manufacturing use products containing methyl bromide and/or chloropicrin.

RCB defers to the Product Manager for these two chemicals regarding the Product Chemistry data requirements for the end-use products.

TS-769:RCB:M.Loftus:vg:CM#2:Rm810:77324:2/14/85
cc: Methyl bromide S.F., Circu., Chloropicrin S.F., R.F.,
    Reviewer, Beusch,
RDI: Schmitt, 2/7/85; Zager, 2/8/85