



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

001910

MEMORANDUM

DATE: APR 29 1981

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. No. 432-487, Resmethrin, Company Response To Toxicology
Branch Review of Neurotoxicity Test.

FROM: John Doherty *John Doherty 3/26/81*
Toxicology Branch/HED (TS-769) *By dph 3/26/81* TOX Chem. No. 83E

TO: F. D. R. Gee, PM #17
Registration Division (TS-767) *WdB*

Background:

The Penick Corporation previously submitted a series of neurotoxicity studies conducted using rats and the test chemical resmethrin. These studies were reviewed (see J. Doherty's review dated April 29, 1980) and the conclusions of this review stated that resmethrin was not shown to produce neuropathies.

EPA's Product Manager replied to the registrant (see letter from F. D. R. Gee dated August 5, 1980 and addressed to Dr. Maarten L. deVries) that there were still problems related to these studies.

Thus, the Penick Corporation consulted Dr. Conrad D. King to reevaluate the studies. This submission contains Dr. King's remarks.

Toxicology Branch Response:

1. The letter from EPA Product Manager to the Penick Corporation (dated August 5, 1980) misrepresented the conclusions of the review of the neurotoxicity studies.

In particular item 2 of this letter was a conclusion related to only one of the three studies reviewed. The other two studies clarified the equivocal result of the first study.

2. The possibility that resmethrin causes neuropathies in rats was again considered by this reviewer (see review of the lifetime chronic feeding study in rats, March, 1981). No evidence of neurological effects were reported.

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