

Sumitomo Chemical Company, Ltd. - Phase 3 - Tetramethrin/RR-1
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**REREGISTRATION PHASE 3 RESPONSE
FOR TETRAMETHRIN**
Company No. 10308, Chemical No. 69003
Case No. 2660

Volume 1

PHASE 3 CHEMICAL RESPONSE WORKSHEET

Date Submitted

May 25, 1990

Submitted by

Sumitomo Chemical Company, Ltd.
5-33, Katahama 4-Chome, Chuo-Ku
Osaka 541, Japan

Prepared by

McKenna, Conner & Cuneo
1575 Eye Street, N.W.
Washington, D.C. 20005

1-511

Introduction

This Phase 3 submission identifies all of the data that Sumitomo Chemical Company is relying upon to support and maintain the reregistration of tetramethrin. In determining whether to reregister tetramethrin, the Agency will consider all information relevant to the risks and benefits of the product. Sumitomo is relying on fifty-two (52) items of data, as identified in Volume 15 of this response, to demonstrate that tetramethrin does not generally cause unreasonable adverse effects on the environment.

In addition, Sumitomo is submitting summaries of fourteen (14) specific studies. While the summarized studies are those that were conducted in compliance with the Agency's most recent guidelines, all of the data in Volume 15 provide important information relevant to the risk-benefit determination. For example, the December 11, 1989 weight of evidence classification of tetramethrin by the Peer Review Committee of the Office of Pesticide programs is based on a consideration of many items of data relevant to the risk determination but not summarized for the purpose of this Phase 3 response. All of the data identified in this Phase 3 submission should be acknowledged as information which supports the reregistration of the product.

CHANGES MADE TO REREGISTRATION PHASE 3 WORKSHEET

CASE: 2660
CHEMICAL: 069003
COMPANY: 010308

CHANGES MADE BY: Norman Spurling
DATE: 8/2/90

GDLN 82-1(a) :

The submitter provided a study not previously submitted. This study will be processed into PDMS as an independent MRID rather than as a normal Phase 3 Summary or Reformat. It has been assigned MRID 92181003 for processing. Since it is not a summary of a previously existing MRID, we have removed the 'X' from column 7.

BEST AVAILABLE COPY

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Company Number / Name	SUMITOMO CHEMICAL COMPANY, LTD.	
010308 / Address	BALTIMORE, MD	
Chemical Number / Name	069003 Tetramethrin	
Case Number / EPA Manager	2660 Linda DeLuise	Use Pattern IKMNO

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	61-1	Chemical Identity	Y R 1		
	61-1	Chemical Identity	41609601	Not Yet Reviewed	
	61-1	Chemical Identity	41609615	Not Yet Reviewed	
B	61-2(a)	Begin. mat. & mnfg.	Y R 1		
	61-2(a)	Begin. mat. & mnfg.	41609601	Not Yet Reviewed	
	61-2(a)	Begin. mat. & mnfg.	41609615	Not Yet Reviewed	
B	61-2(b)	Discussion of Impuri	Y R 1		
	61-2(b)	Discussion of Impuri	41609601	Not Yet Reviewed	
	61-2(b)	Discussion of Impuri	41609615	Not Yet Reviewed	
D	62-1	Preliminary Analysis	Y CR 1		
	62-1	Preliminary Analysis	41609602	Upgradable	
Comments: PROVIDE A DESCRIPTION OF HOW IMPURITY NUMBER 5 COULD BE FORMED. ALTHOUGH [REDACTED] WAS NOT FOUND, A DISCUSSION OF HOW IT COULD BE FORMED IS NEEDED. THE AGENCY REQUIRES A G.S. (SPECTOGRAPH) FOR TECHNICAL GRADE TETRAMETRIN IDENTIFYING EACH PEAK OF 0.1% OR GREATER. ON PAGE 102047 THE IMPURITY LISTED IS "A" RATHER THAN "E". FURTHER EXPLANATION IS NEEDED.					
	62-1	Preliminary Analysis	42014401	Not Yet Reviewed	
Comments: DATA SENT 9/20/91 TO UPDATE MRID 41609602.					
B	62-2	Certification of lim	Y R 1		
	62-2	Certification of lim	41609602	Not Yet Reviewed	

INERT INGREDIENT INFORMATION IS NOT INCLUDED

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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B	62-3	Analytical Method	Y R 1		
	62-3	Analytical Method	41609602	Not Yet Reviewed	
	62-3	Analytical Method	42014401	Not Yet Reviewed	

Comments: SUPPLEMENTAL DATA FOR MRID 41609602.

B	63-2	Color	Y R 1		
	63-2	Color	41609603	Not Yet Reviewed	
B	63-3	Physical State	Y R 1		
	63-3	Physical State	41609602	No Decision Yet	
	63-3	Physical State	41609603	Not Yet Reviewed	
B	63-4	Odor	Y R 1		
	63-4	Odor	41609603	Not Yet Reviewed	
B	63-5	Melting Point	Y R 1		
	63-5	Melting Point	41609603	Not Yet Reviewed	
D	63-6	Boiling Point	R 1		

Comments: THIS DATA REQUIREMENT WAS WAIVED IN PHASE 2.

	63-6	Boiling Point	40528901	No Decision Yet	
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Comments: THE AGENCY CANNOT DETERMINE IF THE STUDY IS ADEQUATE
BECAUSE THE TEST METHOD WAS NOT IDENTIFIED.

	63-6	Boiling Point	42014401	Not Yet Reviewed	
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STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Comments: SENT TO UPGRADE ON 9/20/91.

D	63-7	Density	Y R 1		
	63-7	Density	40528901	No Decision Yet	

Comments: SEE COMMENT FOR 63-6.

	63-7	Density	41609602	Not Yet Reviewed	
	63-7	Density	41609603	Not Yet Reviewed	
	63-7	Density	42014401	Not Yet Reviewed	

Comments: SENT TO UPGRADE 9/20/91.

D	63-8	Solubility	Y R 1		
	63-8	Solubility	41609602	Not Yet Reviewed	
	63-8	Solubility	41609603	Not Yet Reviewed	
	63-8	Solubility	41732801	Upgradable	

Comments: SEE COMMENT 63-6.

	63-8	Solubility	42014401	Not Yet Reviewed	
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Comments: SENT TO UPGRADE 9/20/91.

D	63-9	Vapor Pressure	Y R 1		
	63-9	Vapor Pressure	40572001	No Decision Yet	

Comments: SEE COMMENT 63-6.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	63-9	Vapor Pressure	41609603	Not Yet Reviewed	
	63-9	Vapor Pressure	42014401	Not Yet Reviewed	
	Comments: SENT TO UPGRADE 9/20/91.				
B	63-10	Dissociation Constan	R		
D	63-11	Oct/Water partition	Y CR 1		
	63-11	Oct/Water partition	40248901	No Decision Yet	
	Comments: SEE COMMENT 63-6.				
	63-11	Oct/Water partition	41732802	Not Yet Reviewed	
	63-11	Oct/Water partition	42014401	Not Yet Reviewed	
	Comments: SENT 9/20/91 TO UPGRADE.				
D	63-12	pH	Y CR 1		
	63-12	pH	41064901	No Decision Yet	
	Comments: SEE COMMENT 63-6.				
	63-12	pH	41609603	Not Yet Reviewed	
	63-12	pH	42014401	Not Yet Reviewed	
	Comments: UPGRADE 9/20/91.				
D	63-13	Stability	Y R 1		
	63-13	Stability	40528901	No Decision Yet	

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Comments: SEE COMMENT 63-6.

	63-13	Stability	41609603	Not Yet Reviewed	
	63-13	Stability	42014401	Not Yet Reviewed	

Comments: UPGRADE 9/20/91.

B	63-14	Oxidizing/Reducing A	CR		
B	63-15	Flammability	CR		
B	63-16	Explodability	R		
B	63-17	Storage stability	Y R 1		
	63-17	Storage stability	41995001	Not Yet Reviewed	
B	63-18	Viscosity	CR		
B	63-19	Miscibility	CR		
B	63-20	Corrosion characteri	Y R 1		
	63-20	Corrosion characteri	41995002	Not Yet Reviewed	
B	63-21	Dielectric breakdown	CR		
B	71-1(a)	Acute avian oral qua	Y R 1		
	71-1(a)	Acute avian oral qua	41609604	Fully Accept	

Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. WITH AN LD50 OF GREATER THAN 2250 MG/KG, THE TEST MATERIAL IS CONSIDERED TO BE PRACTICALLY NON-TOXIC TO BOBWHITE QUAIL. THE NOEC WAS 2250 MG/KG. A COPY OF THE DER WAS SENT IN MAY 1992.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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B	71-1(b)	Acute avian oral qua	CR		
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B	71-2(a)	Acute avian diet. qu Y R	1		
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	71-2(a)	Acute avian diet. qu	41609605	Fully Accept	
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Comments: THIS GUIDELINE IS SATISFIED. BASED UPON NOMINAL CONCENTRATIONS, DIETARY LC50 OF NEO-PYNAMIN WAS GREATER THAN 5620 PPM. THIS VALUES CLASSIFIES NEO-PYNAMIN AS PRACTICALLY NON-TOXIC TO BOBWHITE CHICKS. THE NOEC WAS 5620 PPM. A COPY OF THE DER WAS SENT IN MAY 1992.

B	71-2(b)	Acute avian diet. du Y R	1		
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	71-2(b)	Acute avian diet. du	41609606	Fully Accept	
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Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE DER WAS SENT IN MAY 1992.

B	71-3	Wild mammal toxicity	CR		
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B	71-4(a)	Avian repro. quail	CR		
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B	71-4(b)	Avian repro. duck	CR		
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B	71-5(a)	Simulated field stud	CR		
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B	71-5(b)	Actual field study	CR		
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B	72-1(a)	Fish toxicity bluegi Y R	1		
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	72-1(a)	Fish toxicity bluegi	41609607	Fully Accept	
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Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. BASED ON A MEAN MEASURED CONCENTRATIONS, THE 96-HOUR LC50 WAS 15.9 UG/L. THEREFORE, NEO-PYNAMIN IS CLASSIFIED AS VERY HIGHLY TOXIC TO BLUEGILL. THE NOEC

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Chemical/Case Number	Company Number / Name
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STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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MRID Comments Continued:

COULD NOT BE DETERMINED DUE TO THE PRESENCE OF
SUBLETHAL EFFECTS AT ALL TEST CONCENTRATIONS. A COPY
OF THE DER WAS SENT MAY 1992.

B	72-1(b)	Fish toxicity bluegi	CR		
B	72-1(c)	Fish toxicity rainbo	R 1		
	72-1(c)	Fish toxicity rainbo	41609608	Fully Accept	

Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT.
BASED ON MEAN MEASURED CONCENTRATIONS, THE 96-HOUR
LC50 WAS 3.7 UG/L. THE NOEC WAS ESTIMATED AS 2.2
UG/L. A COPY OF THE DER WAS SENT IN MAY 1992.

B	72-1(d)	Fish toxicity rainbo	CR		
B	72-2(a)	Invertebrate toxicit Y R	1 14		
	72-2(a)	Invertebrate toxicit	41609609	Deficient	

Comments: TEST CONCENTRATIONS MEASURED AT 0 AND 48 HOURS WERE
GREATLY DIFFERENT. THE ACTUAL CONCENTRATIONS THE
DAPHIDS WERE EXPOSED TO ARE UNKNOWN. BASED ON MEAN
MEASURED CONCENTRATIONS, THE 48-HOUR LC50 WAS 0.045
MG/L. THEREFORE, NEO-PYNAMIN IS CLASSIFIED AS VERY
HIGHLY TOXIC TO DAPHNIA MAGNA. THE NOEC WAS ESTIMATED
AS 0.024 MG/L. A NEW STUDY IS DUE MAY 31, 1993. A
COPY OF THE DER WAS SENT IN MAY 1992.

	72-2(a)	Invertebrate toxicit Misc		Fully Accept	
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Comments: EEB HAS CLASSIFIED MRID 41609609 AS SUPPLEMENTAL BUT
THE STUDY MUST BE REPEATED ONLY IF AND WHEN THE
LIMITED OUTDDOR USE PATTERNS ARE EXPANDED,
NECESSITATING A REEVALUATION OF THE EXISTING RISKS TO

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069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Correspondence Comments Continued:
INVERTEBRATES.

B	72-2(b)	Invertebrate toxicit	CR		
B	72-3(a)	Estu/mari tox. fish	CR		
B	72-3(b)	Estu/mari tox. mollu	CR		
B	72-3(c)	Estu/mari tox. shrim	CR		
B	72-3(d)	Estu/mari tox. fish	CR		
B	72-3(e)	Estu/mari tox. mollu	CR		
B	72-3(f)	Estu/mari tox. shrim	CR		
B	72-4(a)	Early life stage fis	CR		
B	72-4(b)	Life cycle invertebr	CR		
B	72-5	Life cycle fish	CR		
B	72-6	Aquatic org. accumul	CR		
B	72-7(a)	Simul. field-aquatic	CR		
B	72-7(b)	Actual field-aquatic	CR		
B	81-1	Acute oral tox. rat	Y R 1		
	81-1	Acute oral tox. rat	41609610	Not Yet Reviewed	
	81-1	Acute oral tox. rat	42146405	Fully Accept	

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF
THE DER WAS SENT.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	81-2	Acute dermal tox. ra Y R 1			
	81-2	Acute dermal tox. ra 40276101		No Decision Yet	
	81-2	Acute dermal tox. ra 92181001-Su			
	81-2	Acute dermal tox. ra 42146405		Fully Accept	
Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.					
B	81-3	Acute inhal. tox rat Y R 1			
	81-3	Acute inhal. tox rat 41492101		No Decision Yet	
	81-3	Acute inhal. tox rat 92181002-Su			
	81-3	Acute inhal. tox rat 42146405		Fully Accept	
Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.					
B	81-4	Primary eye irritation Y R 1			
	81-4	Primary eye irritation 41609611		Not Yet Reviewed	
	81-4	Primary eye irritation 42146405		Fully Accept	
Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.					
B	81-5	Primary dermal irrit Y R 1			
	81-5	Primary dermal irrit 41609611		Not Yet Reviewed	
	81-5	Primary dermal irrit 42146405		Fully Accept	

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

B	81-6	Dermal sensitization Y R 1			
	81-6	Dermal sensitization 41609612		Not Yet Reviewed	
	81-6	Dermal sensitization 42146405		Fully Accept	

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

B	81-7	Acute delayed neurot CR			
B	82-1(a)	90-day feeding-roden CR 1			
	82-1(a)	90-day feeding-roden 41698905		Not Yet Reviewed	
	82-1(a)	90-day feeding-roden 42146404		Deficient	
B	82-1(b)	90-day feeding-nonro CR 1			
	82-1(b)	90-day feeding-nonro 41698902		Not Yet Reviewed	
	82-1(b)	90-day feeding-nonro 42146404		Deficient	
B	82-2	21-day dermal-rabbit Y CR 1			
	82-2	21-day dermal-rabbit 41995004		Fully Accept	

Comments: LETTER SENT 6/93. DER SENT.

	82-2	21-day dermal-rabbit 42146404		Deficient	
B	82-3	90-day dermal-rodent CR			
B	82-4	90-day inhal.-rat Y CR 1			06/30/95

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STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	82-4	90-day inhal.-rat	41995003	Upgradable	
	Comments: LETTER AND DER SENT 6/93.				
	82-4	90-day inhal.-rat	42012101	Upgradable	
	Comments: LETTER AND DER SEMT 6/93.				
	82-4	90-day inhal.-rat	42146404	Deficient	
B	82-5(a)	90-day neurotox-hen	CR		
B	82-5(b)	90-day neurotox-mamm	CR		
	Comments: A SPECIAL SCREENING BATTERY IS REQUIRED IN LIEU OF THE STANDARD 90-DAY STUDY. SEE COMMENTS AT THE END OF THE ADDENDUM.				
B	83-1(a)	Chronic tox-rodent	Y CR 1		
	83-1(a)	Chronic tox-rodent	158951	No Decision Yet	
	83-1(a)	Chronic tox-rodent	92181004-Su		
	83-1(a)	Chronic tox-rodent	40276301	No Decision Yet	
	83-1(a)	Chronic tox-rodent	92181004-Su		
	83-1(a)	Chronic tox-rodent	40280401	No Decision Yet	
	83-1(a)	Chronic tox-rodent	92181004-Su		
	83-1(a)	Chronic tox-rodent	41723301	Not Yet Reviewed	
	83-1(a)	Chronic tox-rodent	41723302	Not Yet Reviewed	
B	83-1(b)	Chronic tox - non-ro	Y CR 1		

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	83-1(b)	Chronic tox - non-ro	42189301	Fully Accept	
	Comments: OUR DECEMBER 1992 ACCEPTED THIS STUDY. NOEL=300 MG/KG/DAY (HDT).A COPY OF THE DER WAS SENT. THIS GUIDELINE IS FULFILLED.				
B	83-2(a)	Oncogenicity - rat	CR 1		
	83-2(a)	Oncogenicity - rat	41698904	Not Yet Reviewed	
	83-2(a)	Oncogenicity - rat	41723301	Not Yet Reviewed	
B	83-2(b)	Oncogenicity-mouse	Y CR 1		
	83-2(b)	Oncogenicity-mouse	158951	No Decision Yet	
	83-2(b)	Oncogenicity-mouse	92181004-Su		
	83-2(b)	Oncogenicity-mouse	40276301	No Decision Yet	
	83-2(b)	Oncogenicity-mouse	92181004-Su		
	83-2(b)	Oncogenicity-mouse	40280401	No Decision Yet	
	83-2(b)	Oncogenicity-mouse	92181004-Su		
	83-2(b)	Oncogenicity-mouse	41698901	Not Yet Reviewed	
	83-2(b)	Oncogenicity-mouse	41698904	Not Yet Reviewed	
D	83-3(a)	Teratogenicity - rat	Y CR 1		
	83-3(a)	Teratogenicity - rat	114369	Upgradable	
	Comments: PERCENT PURITY OF THE TECHNICAL MATERIAL WAS NOT CLEARLY IDENTIFIED. IF THE DATA CAN BE SUPPLIED, THEN STUDY CAN BE UPGRADED.				
	83-3(a)	Teratogenicity - rat	92181006-Su		

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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83-3(a) Teratogenicity - rat 42014402 Fully Accept

Comments: THIS STUDY WAS SUBMITTED TO UPGRADE MRID 114369. SENT FOR REVIEW ON 9/20/91. AS STATED IN OUR NOVEMBER 1991 LETTER THIS STUDY UPGRADES MRID 114369. THIS GUIDELINE IS SATISFIED. A COPY OF THE DER WAS SENT.

83-3(a) Teratogenicity - rat 42189201 Fully Accept

Comments: THIS SUBMISSION INCLUDED BOTH A RANGE FINDING STUDY AND A MAIN STUDY. THESE STUDIES WERE INITIATED TO FULFILL A REQUEST BY CALIFORNIA REGULATORY AUTHORITIES. THE REGISTRANT WANTED THE AGENCY TO HAVE AN EQUIVALENT DATA BASE TO THAT OF CALIFORNIA. THESE STUDIES ARE ACCEPTABLE. THE MATERNAL NOEL IS 500 MG/KG/DAY AND THE LEL WAS 1000 MG/KG/DAY WITH DECREASED BODY WEIGHT GAIN (42.8%) AND DECREASED FOOD CONSUMPTION (10.7%) OCCURRING DURING DAYS 6-9 OF GESTATION. THE DEVELOPMENTAL NOEL IS 1000 MG/KG/DAY (HDT). DOSE LEVELS WERE 0, 150, 500, AND 1000 MG/KG/DAY. A COPY OF THE DER WAS SENT.

83-3(a) Teratogenicity - rat 42189202 Fully Accept

Comments: SEE COMMENTS FOR MRID 42189201.

B 83-3(b) Teratogenicity - rab Y CR 1

83-3(b) Teratogenicity - rab 41995005 Fully Accept

Comments: LETTER AND DER SENT 6/93.

83-3(b) Teratogenicity - rab 42878001 Fully Accept

Comments: LETTER AND REVIEW SENT 9/15/93.

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Chemical/Case Number 069003 / 2660	Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD.
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STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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	83-3(b)	Teratogenicity - rab 42878002		Fully Accept	
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Comments: LETTER AND REVIEW SENT 9/15/93.

D	83-4	2-generation repro.-	CR 1 14		
	83-4	2-generation repro.-	161842	No Decision Yet	
	83-4	2-generation repro.-	92181007-Su		
	83-4	2-generation repro.-	40777801	Fully Accept	

Comments: SINCE THIS STUDY WAS CONDUCTED USING NEOPYNAMIN FORTE RATHER THAN TETRAMETRIN, YOU MUST SUBMIT TOXICITY DATA AND/OR METABOLISM STUDIES COMPARING NEOPYNAMIN FORTE TO TETRAMETRIN BEFORE WE CAN DETERMINE WHETHER THIS STUDY CAN BE USED IN SUPPORT OF THIS GUIDELINE. PROVIDED BY MRIDS 4214601 THRU 06 AND 42161501 AND 02. OUR LETTER OF AUGUST 1992 ACCEPTED THESE AS BRIDGING THE DATA.

	83-4	2-generation repro.-	92181007-Su		
	83-4	2-generation repro.-	42146401	Upgradable	

Comments: USED TO BRIDGE DATA.

	83-4	2-generation repro.-	42146402	Upgradable	
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Comments: USED TO BRIDGE DATA.

	83-4	2-generation repro.-	42146403	Upgradable	
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Comments: USED TO BRIDGE DATA.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	83-4	2-generation repro.-	42146404	Upgradable	
		Comments:	USED TO BRIDGE DATA.		
	83-4	2-generation repro.-	42146405	Upgradable	
		Comments:	USED TO BRIDGE DATA.		
	83-4	2-generation repro.-	42146406	Upgradable	
		Comments:	SED TO BRIDGE DATA.		
	83-4	2-generation repro.-	42161501	Upgradable	
		Comments:	USED TO BRIDGE DATA.		
	83-4	2-generation repro.-	42161502	Upgradable	
		Comments:	USED TO BRIDGE DATA.		
	83-4	2-generation repro.-	Analog	Fully Accept	
		Comments:	BRIDGING ARGUMENT. POSSIBLE TIME EXTENSION. SENT 6/16/92. ACCEPTED IN OUR AUGUST 1992 LETTER.		
B	84-2(a)	Gene mutation-ames	Y R 1		
	84-2(a)	Gene mutation-ames	40275801	No Decision Yet	
	84-2(a)	Gene mutation-ames	92181009-Su		
	84-2(a)	Gene mutation-ames	40276001	No Decision Yet	
	84-2(a)	Gene mutation-ames	92181008-Su		

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	84-2(b)	Struct. chrom. aberr Y R 1			
	84-2(b)	Struct. chrom. aberr 40275901		Deficient	
Comments: THIS STUDY IS INADEQUATE. HOWEVER, OTHER DATA EXISTS FOR THIS GUIDELINE. ONLY MALE MICE WERE USED AND TARGET CELLS WERE NOT REACHED.					
	84-2(b)	Struct. chrom. aberr 92181012-Su			
	84-2(b)	Struct. chrom. aberr 41227201		No Decision Yet	
	84-2(b)	Struct. chrom. aberr 41347801		No Decision Yet	
	84-2(b)	Struct. chrom. aberr 92181010-Su			
	84-2(b)	Struct. chrom. aberr 41347802		No Decision Yet	
	84-2(b)	Struct. chrom. aberr 92181011-Su			
B	84-4	Other genotoxic effe Y R 1 14			06/30/95
	84-4	Other genotoxic effe 40778401		No Decision Yet	
	84-4	Other genotoxic effe 92181013-Su			
	84-4	Other genotoxic effe 42414401		Deficient	
Comments: OUR 6/93 LETTER REJECTED THIS STUDY.					
	84-4	Other genotoxic effe 42414402		Deficient	
Comments: OUR 6/93 LETTER REJECTED THIS STUDY.					
	84-4	Other genotoxic effe 42414403		Deficient	
Comments: OUR 6/93 LETTER REJECTED THIS DATA.					

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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	84-4	Other genotoxic effe Protocol		Fully Accept	
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Comments: OUR LETTER DATED NOVEMBER 1991 ACCEPTS YOUR PROTOCOL
DATED AUGUST 9, 1991.

B	85-1	General metabolism	Y CR 1		
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Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME
EXTENSION IS GRANTED TO AUGUST 24, 1992.

	85-1	General metabolism	42448901	Fully Accept	
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Comments: OUR LETTER ACCEPTED THIS DATA IN 5/93.

	85-1	General metabolism	42448902	Fully Accept	
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Comments: OUR LETTER ACCEPTED THIS DATA IN 5/93.

B	85-2	Dermal penetration	CR		
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B	86-1	Domestic animal safe	CR		
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B	122-1(a)	Seed germ/seedling e	cr		
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B	122-1(b)	Vegetative vigor	cr		
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B	122-2	Aquatic plant growth	cr		
---	-------	----------------------	----	--	--

B	123-1(a)	Seed germ/seedling e	cr		
---	----------	----------------------	----	--	--

B	123-1(b)	Vegetative vigor	cr		
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B	123-2	Aquatic plant growth	cr		
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B	124-1	Terrestrial field	cr		
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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	124-2	Aquatic field	cr		
B	132-1(a)	Foliar residue dissi	cr		
		Comments: THIS DATA REQUIREMENT IS RESERVED.			
B	132-1(b)	Soil residue dissipa	cr		
		Comments: THIS DATA REQUIREMENT IS RESERVED.			
B	133-3	Dermal passive dosim	cr		
		Comments: THIS DATA REQUIREMENT IS RESERVED.			
B	133-4	Inhal. passive dosim	cr		
		Comments: THIS DATA REQUIREMENT IS RESERVED.			
B	141-1	Honey bee acute cont Y CR 1			
	141-1	Honey bee acute cont 41609613		Fully Accept	
		Comments: THIS STUDY SHOWS NEO-PYNAMIN TO BE HIGHLY TOXIC TO HONEY BEES. IN AN ACUTE CONTACT TEST, THE LD50 WAS DETERMINED TO BE APPROXIMATELY 0.155 MICROGRAMS PER BEE. THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE DER WAS SENT IN MAY 1992.			
B	141-2	Honey bee residue on Y CR 1 14			
	141-2	Honey bee residue on 41940801		Fully Accept	
		Comments: THE DATA SHOW THAT FOLIAR RESIDUES OF NEO-PYNAMIN DO NOT PRESENT A HAZARD TO HONRY BEES WHEN THE PRODUCT IS APPLIED AT ONE LINEAR FOOT PER SECOND. THIS STUDY			

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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MRID Comments Continued:

SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE
DER WAS SENT ON JUNE 9, 1992.

141-2	Honey bee residue on 42023701	No Decision Yet
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Comments: THIS IS AN AMMENDMENT TO MRID 41940801. THIS
AMENDMENT WAS SUBMITTED TO PROVIDE ANALYTICAL DATA.
THE AMENDMENT SIMPLY INDICATES THAT NO SUITABLE
METHOD WAS ESTABLISHED FOR ANALYSIS OF TETRAMETHRIN
RESIDUES ON ALFALFA. IN ANY CASE, ANALYTICAL DATA
WERE NOT ESSENTIAL TO EVALUATION OF THE FOLIAR
RESIDUE STUDY. REVIEW DATED SEPTEMBER 17, 1992.

141-2	Honey bee residue on Time Ext	Fully Accept
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Comments: A TIME EXTENSION IS GRANTED TO JULY 15, 1991 DUE TO
TECHNICAL DIFFICULTIES INCURRED IN CONDUCTING THE
STUDY.

B	141-5	Field test for polli	CR
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B	160-5	Chemical identity	Y R 1
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160-5	Chemical identity	41609614	Not Yet Reviewed
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B	161-1	Hydrolysis	Y R 1
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Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME
EXTENSION TO AUGUST 24, 1991 IS GRANTED.

161-1	Hydrolysis	41995006	Not Yet Reviewed
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D	161-2	Photodegradation-wat	14	Required
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161-2	Photodegradation-wat Waiver	Not Yet Reviewed
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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Comments: ON AUGUST 30, 1991 A WAIVER WAS REQUESTED AND SENT FOR REVIEW ON 9/6/91. OUR NOVEMBER 1992 LETTER ACCEPTED THIS WAIVER.

B	161-3	Photodegradation-soi			
B	161-4	Photodegradation-air	cr		
B	162-1	Aerobic soil metabol	Y R 1 14		

Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION IS GRANTED TO AUGUST 24, 1992.

	162-1	Aerobic soil metabol	42563301	Not Yet Reviewed	
	162-1	Aerobic soil metabol	Time Ext	Fully Accept	

Comments: Requested on 8/7/92. Extension until 11/24/92. GRANTED ON 11/5/92.

B	162-2	Anaerobic soil metab			
B	162-3	Anaerobic aquatic me			
B	162-4	Aerobic aquatic meta			
B	163-1	Leach/adsorp/desorpt	Y R 1 14		
	163-1	Leach/adsorp/desorpt	41995007	Not Yet Reviewed	
	163-1	Leach/adsorp/desorpt	42212901	Not Yet Reviewed	

Comments: AGED LEACHING STUDY.

	163-1	Leach/adsorp/desorpt	42304701	Not Yet Reviewed	
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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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Comments: SUPPLEMENT TO MRID42212901.

163-1	Leach/adsorp/desorpt	Time Ext	Fully Accept
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Comments: AS OUR LETTER OD DECEMBER 1990 STATED, A TIME EXTENSION IS GRANTED TO AUGUST 24, 1991.

D	163-2	Volatility - lab	CR 8 14	Required
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Comments: SINCE THE VAPOR PRESSURE IS ONLY marginally ABOVE THE TRIGGER VALUE AND THE TOXICOLOGICAL CHARACTERISTICS OF TETRAMETRIN ARE NOT COMPLETELY ESTABLISHED, OUR POSITION REMAINS THAT THIS STUDY IS REQUIRED.

163-2	Volatility - lab	Time Ext	Denied
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Comments: A TIME EXTENSION IS NOT APPLICABLE SINCE NO COMMITMENT CURRENTLY EXISTS.

163-2	Volatility - lab	Waiver	Fully Accept
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Comments: DROPPED GREENHOUSE USE. SENT FOR REVIEW AGAIN 6/20/92. OUR NOVEMBER 1992 LETTER ACCEPTED THE WAIVER.

B	163-3	Volatility - field	CR	Required
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163-3	Volatility - field	Misc
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B	164-1	Terrestrial field di Y R	1 14
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Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION TO AUGUST 24, 1992 IS GRANTED.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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164-1 Terrestrial field di 42487301 No Decision Yet

Comments: NOT SENT FOR REVIEW. INTERIM REPORT (10/5/92).

164-1 Terrestrial field di 42487302 No Decision Yet

Comments: NOT SENT FOR REVIEW. INTERIM REPORT (10/5/92).

164-1 Terrestrial field di 42622401 Not Yet Reviewed

164-1 Terrestrial field di 42622402 Not Yet Reviewed

164-1 Terrestrial field di Time Ext Fully Accept

B 164-2 Aquatic field dissip

B 164-3 Forest field dissipa R

B 164-5 Long term soil diss cr

Comments: THIS DATA REQUIREMENT IS RESERVED PENDING RESULTS OF
THE FIELD DISSIPATION STUDY.

B 165-1 Confined rotational

B 165-2 Field rotational cro

B 165-3 Accumulation - irrig

D 165-4 Bioaccumulation in f 14

Comments: THIS IS REQUIRED WHEN SIGNIFICANT CONCENTRATIONS OF
THE ACTIVE INGREDIENT AND/OR ITS PRINCIPAL
DEGRADATION PRODUCTS ARE LIKELY TO OCCUR IN AQUATIC
ENVIRONMENTS AND MAY ACCUMULATE IN AQUATIC ORGANISMS.

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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165-4 Bioaccumulation in f Waiver Fully Accept

Comments: ON AUGUST 30, 1991 A WAIVER WAS REQUESTED AND SENT FOR REVIEW ON 9/6/91. OUR NOVEMBER 1992 LETTER GRANTED THE WAIVER.

B 165-5 Bioaccum-aquatic non

B 166-1 Grd water-small pros

Comments: SEE COMMENT FOR 164-5.

B 166-2 Grd water-sm. retros

Comments: SEE COMMENT FOR 164-5.

B 166-3 Grd water-irg retros

Comments: SEE COMMENT FOR 164-5.

GUIDELINE 167-1- SURFACE WATER FIELD RUNOFF AND
GUIDELINE 167-2- SURFACE WATER MONITORING ARE ALSO
RESERVED PENDING RESULTS OF FIELD DISSIPATION STUDY.

D 201-1 Droplet size spectru 14 Required

201-1 Droplet size spectru Waiver Fully Accept

Comments: REGISTRANT HAS REQUESTED WAIVER ON 11/25/91. OUR NOVEMBER 1992 LETTER GRANTED THE WAIVER.

D 202-1 Drift field evaluati 14 Required

Comments: GUIDELINE #231- ESTIMATION OF DERMAL EXPOSURE AT

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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
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GDLN Comments Continued:

OUTDOOR SITES

GUIDELINE #232- ESTIMATION OF INHALATION EXPOSURE AT
OUTDOOR SITES

GUIDELINE #233- ESTIMATION OF DERMAL EXPOSURE AT
INDOOR SITES

GUIDELINE #234- ESTIMATION OF INHALATION EXPOSURE AT
INDOOR SITES

BASED ON THE AVAILABLE TOXICITY DATA THESE STUDIES
ARE RESERVED.

SPECIAL STUDIES REQUIRED:

SINCE THIS IS A PYRETHROID THE FOLLOWING SPECIAL
STUDIES ARE REQUIRED:

81-8SS ACUTE NEUROTOXICITY SCREENING- RAT
THIS BATTERY INCLUDES FUNCTIONAL OBSERVATION,
MOTOR ACTIVITY AND NEUROPATHOLOGY.

82-7SS 90-DAY NEUROTOXICITY- MAMMALS

THIS BATTERY INCLUDES FUNCTIONAL OBSERVATION,
MOTOR ACTIVITY AND NEUROPATHOLOGY. A RADIOIMMUNOASSAY
FOR GLIAL FIBRILLARY ACIDIC PROTEIN MUST BE INCLUDED
AS WELL AS OBSERVATIONS, NEUROPATHOLOGY, ACETYL
CHOLINESTERASE AND NEUROTOXIC ESTERASE.

202-1	Drift field evaluati	Waiver	Fully Accept
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Comments: REGISTRANT REQUESTED WAIVER ON 11/25/91. OUR NOVEMBER
1992 LETTER ACCEPTED THE WAIVER.

B	171-2	Chemical identity	Y R 1
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171-2	Chemical identity	41609615	Not Yet Reviewed
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Chemical/Case Number	Company Number / Name
069003 / 2660	010308 SUMITOMO CHEMICAL COMPANY, LTD.

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	171-3	Directions for use	Y R		
B	171-5	Reduction of residue			
B	171-4(a)	Nature of residue -	CR		
B	171-4(b)	Nature of residue -			
B	171-4(c)	Res. analyt. method	CR		
B	171-4(d)	Res. analyt. method			
B	171-4(e)	Storage stability	CR		
B	171-4(f)	Mag. of res. potable			
B	171-4(g)	Mag. of res. in fish			
B	171-4(h)	Mag. of res. irrigat			
B	171-4(i)	Mag. of res. food ha			
B	171-4(j)	Mag. meat/milk/poult			
B	171-4(k)	Cropfield trials	CR		
B	171-4(l)	Processed food			
B	171-6	Proposed tolerance			
B	171-7	Support for toleranc			
B	171-13	Anal. Reference Stnd			

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