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1/10/78

EEE BRANCH REVIEW

DATE: IN _____ OUT _____ IN 1/9/78 OUT 1/10/78 IN _____ OUT _____

FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 279-GURG

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED _____

DATE OF SUBMISSION _____

DATE SUBMISSION ACCEPTED 3 CID-Yes

TYPE PRODUCT(S): (I) D, H, F, N, R, S

PRODUCT MGR. NO. 17

PRODUCT NAME(S) Pounce Technical

COMPANY NAME FMC

SUBMISSION PURPOSE Registration of Technical Permethrin

CHEMICAL & FORMULATION _____

1. Introduction

Applicant proposes the registration of the technical product named Pounce Technical For Formulation of Insecticides Only. The technical product contains 92% of the insecticidally active ingredient. The common name of the active ingredient is either proposed or accepted as "Permethrin" and the active ingredient is mixture of the cis and trans isomers of the chemical (3-phenoxyphenyl) methyl (±) cis-trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropancarboxylate, with a specified minimum 35% of the cis isomer and a maximum 65% of the trans isomer.

No crops or insects are mentioned on the label. The only indication of use pattern is the label statement: Physical and chemical data and formulating information is given in the POUNCE Technical Bulletin, but this bulletin has not been submitted for review and evaluation.

The label for another product was submitted along with the technical product label. The other product is called Pounce 3.2 EC Insecticide (FMC 33297) and contains 38.4% of the active ingredient called permethrin. The Pounce 3.2 EC is intended for use on cotton for control of bollworm, tobacco budworm, bool weevil, pink bollworm, cotton leafperforator, and lygus.

Reviewer notes that the terms 'pyrethroid' or 'systhetic pyrethroid' do not appear upon the technical product label POUNCE Technical or upon the formulated product label POUNCE 3.2 EC Insecticide. Since the Pounce Technical Bulletin has not been submitted for our review, we do not know if these terms appear in the technical bulletin.

2. Directions for Use

Pounce Technical
EPA File Symbol 279-GNRG
For Formulation of Insecticides Only

For formulation of insecticides:

Physical and chemical data and formulating information is given in the Pounce Technical Bulletin.

The "Pounce Technical Bulletin" has not been submitted for review, therefore we have no information on claims of enviornmental safety (such as "not persistent", "leaves no residues", "biodegradable", etc.) which may appear in the technical bulletin.

3. Discussion of Data: EPA File Symbol 279-GNPG

Applicant does not submit separate data for the technical product; applicant references all the submitted environmental chemistry data in support of the technical product.

4. Conclusions

The environmental chemistry data requirements for the registration of a technical product are hydrolysis data and the activated sludge metabolism data, to determine if the technical material can have an adverse effect on the environment as a result of discharge of manufacturing wastes.

The applicant has submitted the hydrolysis data, which will be reviewed under the request for registration of the formulated product EPA File Symbol 279-GNRU Pounce 3.2 EC, which see.

The applicant has not submitted any data by title pursuant to the activated sludge metabolism of the technical material. Certain of the references or citations may contain information relative to the activated sludge data, when reviewed by title only. These references or citations will also be reveiwed under the request for registration of the ~~technical~~ formulated product, EPA File Symbol 279-GNRU Pounce 3.2 EC.

5. Recommendations

No recommendations can be made at this time, since there is inadequate data upon which to base a recommendation.

The environmental chemistry data requirements for the registration of a technical product are hydrolysis and activated sludge metabolism data. The references pertaining to hydrolysis data will be evaluated in our consideration of EPA File Symbol 279-GNRU Pounce 3.2 EC: References #2, #3, and #4 of Book 13 of 17.

Here is an example of an adequate activated sludge metabolism protocol:

> An activated sludge metabolism study using radiolabeled chemical or comparable techniques is required. Add synthetic sewage (nutrients) and radioisotopic material to activated sludge and aerate in a closed system for 23 hours; allow the sludge to settle for 30 minutes. Remove a liter of supernatant (effluent) for pesticide residue analysis including a material balance. Add fresh synthetic sewage and test compound to the remaining sludge and repeat the cycle. Dosage should start at 0.1 ppm and increase by increments to 100 ppm. Effects on microbial population must be determined by daily total counts of viable organisms in sludge.

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1/10/78
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