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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OPP OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

209500

MEMORANDUM

APR 11 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

TO: C. Dively, Product Manager Team #17
Registration Division (TS-767)

THRU: William L. Burnam, Acting Branch Chief
Toxicology Branch
Hazard Evaluation Division (TS-769)

wlb

SUBJECT: PP 2F2752, Request for a Tolerance of 6.0 ppm of Permethrin on Mushrooms. Request for Registration of the Products POUNCE Mushroom Dust (EPA Reg.#279-) and POUNCE Mushroom Spray Mist. Review of the Acute Toxicity of The Product POUNCE 25 WP and POUNCE Mushroom Dust.

TOX Chem. No. 652BB

Background:

The FMC Corp., Philadelphia, Pa. is requesting to establish a tolerance for their insecticide as follows:

It is proposed that a new tolerance be established for residues of the combined cis and trans isomers of the insecticide permethrin, (3-phenoxyphenyl) methyl 3-(2,2-dichloroethenyl)-2,2-dimethyl-cyclopropanecarboxylate, and its metabolites cis and trans 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid and 3-phenoxybenzyl alcohol, calculated as permethrin, in or on the following raw agricultural commodity:

Commodity	Parts Per Million
Mushrooms	6.0

Registration of the products POUNCE Mushroom Dust Insecticide and POUNCE Mushroom Spray Mist is also sought.

Recommendations:

1. Toxicology Branch (TB) has no objection to establishing the proposed tolerance for permethrin on mushrooms. See the 8 pt. review attached. Residue Chemistry Branch must concur that the level of 6.0 ppm and the label instructions for application are appropriate.

Inert ingredient information may be entitled to confidential treatment

2. TB has no objection to the registration of either product, POUNCE Mushroom Spraymist or POUNCE Mushroom Dust, for use on mushrooms.

3. The product POUNCE Mushroom Dust has the signal word CAUTION. No acute oral or acute dermal LD_{50} or acute inhalation LC_{50} studies were submitted on this 2% product to support this signal word (see review below). Toxicology Branch, however, will waive the requirement for these studies because the product is similar to the more concentrated POUNCE 25 WP which contains 25% permethrin. The same inerts were used to make the 25% and 2% products (except that the 2% product contains [redacted] in addition) and thus, based on the known toxicity of the active ingredient and the inerts, Toxicology Branch does not consider that completion of these studies will result in a change in the signal word or precautionary labeling.

Before this product (POUNCE Mushroom Dust) is registered, the registrant should submit an application for registration so that a registration number can be assigned. The product is <u>not</u> sufficiently close in composition to register as an amendment to POUNCE 3.2 EC as requested.

*<u>NOTE</u>: The inerts in this product are cleared for the use requested.

4. The product POUNCE Mushroom Spraymist is the same product as POUNCE 3.2 EC (EPA Reg. No. 279-3014) which is already registered for use on RACs.

5. Five acute studies for the product POUNCE 25 WP were reviewed and were found to be Core Minimum or better.

No registration request for this product has been submitted. The data were submitted to support the registration of the product POUNCE Mushroom Dust which contains the same inerts ([redacted] but a lower percentage of the active ingredient Permethrin.

6. Two acute studies (eye and skin irritation) and a sensitization study for the product POUNCE Mushroom Dust were reviewed and were found to be Core Minimum or better.

<u>8 Point Study</u>

(Prepared for PP#2F2752: Permethrin on Mushrooms - March 1, 1983)

1. Data considered in establishing this tolerance included:

NOTE: Only studies submitted by the FMC Corporation are listed except where indicated.

Acute Oral LD_{50}, rat	8.9 gm/kg
90-Day Feeding, rat 55% cis/45% trans	NOEL = 100 ppm LEL = 500 ppm (liver changes)
90-Day Feeding, dog 50% cis/50% trans	NOEL = 50 mg/kg/day LEL = 364 mg/kg/day (behavior and liver AP changes and other effects)
3-Generation Reproduction Study, rat	NOEL = 100 ppm (HDT)
Teratology, rat	NOEL = 200 mg/kg/day (HDT)
Teratology, mouse	NOEL = 400 mg/kg/day (HDT)
Teratology, rabbit	NOEL = 400 mg/kg/day (HDT)
Chronic Feeding, dog 6-months (submitted by the Burroughs-Wellcome Company)	NOEL = 250 mg/kg/day (HDT)
Chronic Feeding, rat	NOEL = 100 ppm LEL = 500 ppm (HDT, liver changes)
Oncogenesis, mouse	Positive Oncogenic response in liver and lung of females at 2500 and 5000 ppm.
Metabolism and Excretion in the rat and dog (dog study submitted by ICI Americas)	Data indicate that permethrin is rapidly metabolized and excreted
Mutagenesis	Not mutagenic in Salmonella or Escherichia
Dominant Lethal	Not mutagenic at 285 mg/kg (HDT, 40% cis/60% trans)
Special Neurotoxicity	Only minimal findings in sciatic nerve at 6000 ppm (swelling)

The ICI Corporation and the Burroughs-Wellcome Corporation have also submitted studies to support petitions and registrations for the insecticide permethrin.

One study submitted jointly by the FMC Corporation and the ICI Corporation (FMC Mouse II listed above) was determined to show an oncogenic effect in liver and lung tissues. The possible association between feeding permethrin and development of increased incidences of lung neoplasms was corroborated by the results of the mouse oncogenesis study submitted by the Burroughs-Wellcome Company.

As of February 1982, petitions for tolerances for permethrin are being granted based on a NOEL of 100 ppm obtained from a 2-year rat chronic feeding/oncogenesis study submitted by the FMC Corporation and employing a safety factor of 100. These parameters are considered as appropriate for protecting the public health.

2. There are no other studies considered desirable at this time.

3. N/A

4. Other tolerances granted for this pesticide are listed in the computer printout sheet attached.

5. Granting this tolerance will change the TMRC from 0.9836 to 0.9863 mg/day (1.5 kg) or<1.0%. The % ADI used up will become 32.88%.

6. The MPI is 3.000 mg/day (60 kg). The rat 2-year chronic feeding study submitted by the FMC Corporation, with a NOEL of 100 ppm, and a safety factor of 100 were used to determine the ADI.

7. N/A

8. N/A

Studies Reviewed

A. With POUNCE 25 WP (EPA Acc. No. 071082)

Study	Result	Toxicity Category	Core Classificati
Acute Oral LD_{50} - rats	1.9 (±0.2) gm/kg - males 1.1 (±0.2) gm/kg - females	III	Guidelines
Acute Dermal LD_{50} - rabbits	> 2.0 gm/kg (no deaths)	III	Minimum
Acute Inhalation LC_{50} - rats	> 5.38 mg/L for 1 hour (gravimetic analysis)	III	Minimum
Primary Skin Irritation - rabbits	PII = 1.1	IV	Guidelines
Primary Eye Irritation - rabbits	Minor corneal involvement reversed by 48 hours	III	Guidelines

B. With POUNCE Mushroom Dust

Primary Eye Irritation - rabbits	No corneal involvement	IV	Guidelines
Primary Skin Irritation - rabbits	PII = 0/8.0	IV	Guidelines
Sensitization - guinea pig (maximization test)	Not a sensitizer		Minimum

Acute Oral Toxicity Study FMC 33297 Permethrin 25 WP.

FMC Toxicology Lab., #A81-633, December 1981.

Six groups of 10 male and 10 female rats (Sprague-Dawley) were dosed with test material: POUNCE 25 WP (ME W360) by gavage. The males were administered either 1.0, 1.4, 1.8, 2.0, 3.0 or 4.0 gm/kg; the females were administered either 0.7, 1.0, 1.2, 1.4, 1.8 or 2.0 gm/kg of the test material. The rats were observed for 14 days.

LD_{50}'s of 1.9 ($\pm$0.2) gm/kg for males and 1.1 ($\pm$0.2) gm/kg for females were determined by the method of Berkson 1955 (J. Amer. Stat. Assoc., Vol. 50, page 130).

The toxic signs noted included severe tremors, clonic convulsions, seizure like gestures and hyperactivity to sound. These signs abated before 48 hours for most rats. The survivors gained weight following intoxication. No unusual gross necropsy findings were reported as being present among the survivors. The animals dying during the study showed evidence of chromo-rhinorrhea, chromodacryorrhea, abdominal staining and oral discharge.

This study is CORE GUIDELINES. The product is Toxicity Category III by the oral route.

Acute Dermal Toxicity Study FMC 33297 Permethrin 25 WP.

FMC Toxicology Lab., A81-632, December 4, 1981

Ten rabbits were prepared by clipping and abrading and dosed with 2.0 gm/kg of test material (POUNCE 25 WP, ME W360) and the material was kept in place for 24 hours. Following exposure, the rabbits were monitored for 14 days for toxicity signs.

No rabbits died, necropsy of the rabbits (at 14 days) did not reveal unusual findings. Some signs of diarrhea and erythema developed.

This study is CORE MINIMUM. Only a single dose level was used. The LD_{50} of > 2.0 gm/kg is supported. The product is Toxicity Category III by the dermal route.

One Hour Acute Dust Inhalation Toxicity Study In Rats Of FMC 33297 25% WP.

Toxigenics, Inc. 420-0830 and FMC # A81- 636, January 13, 1982.

Ten rats (5 males and 5 females) were exposed to atmospheres containing dust generated from the test material POUNCE 25 WP (ME W360) for 1 hour. The dust was generated by a "dust shaker mechanism" which introduced the dust into the top of an 30 liter chamber and was exhausted at the bottom. The chamber concentration was determined 3 ways (gravimetric or weight of material trapped on paper, nominal or test material weight used per unit of air used, and analytical analysis of the material on the paper). The particle size of the test material was determined using a Debron Cascade Impactor.

None of the rats died due to exposure, the rats showed some signs of irregular breathing, crusty nose, hypersensitivity and poor coat quality. Necropsy did not reveal definite test material related effects.

The results of the analysis of the chamber by gravimetric analysis indicated that the concentration of the test material was 5.38 mg/L. This corresponded to 5.27 mg/L by analytical concentration as reported.

This study is CORE MINIMUM. Sufficient data were generated to assign a Toxicity Category III based on gravimetric concentration.

Primary Skin Irritation Study FMC 33297 Permethrin 25 WP.

FMC Toxicology Lab., #A81-630, November 16, 1981

0.5 gm of test material (POUNCE 25 WP, ME W360) were applied to the prepared backs (clipped and abraded in selected areas) of 6 rabbits (4 males and 2 females). The test material was kept in place for 24 hours by using a gauze patch and tape. The skin was monitored for 4 days for reactions.

A PII of 1.1/8.0 at 72 hours was noted. The skin was reported as normal by day four.

This study is CORE GUIDELINES. The product is Toxicity Category IV.

Primary Eye Irritation Study FMC 33297 Permethrin 25 WP.

FMC Toxicology Lab., #A81-631, November 16, 1981

The right eye of 9 New Zealand white rabbits were instilled with 0.1 gm of test material (POUNCE 25 WP, ME W360). Three of the rabbits were washed with water 20-30 seconds post dosing. The rabbits were monitored for ocular irritation at 1, 24, 48 and 72 hours and 4 days after instillation.

Some corneal involvement was noted but was present for less than 48 hours. Other signs of irritation was reversed by day 4.

This study is CORE GUIDELINES. The product is Toxicity Category III based on eye irritation.

The following studies are with the product POUNCE Mushroom Dust.

Primary Eye Irritation Study FMC 33297 Permethrin 2% Dust.

FMC Toxicology Lab., #A81-629, November 16, 1981

100 mg of test material (POUNCE 2% Dust, ME W252) was instilled into the right eye of each of 9 rabbits. The eyes of 3 rabbits were washed with distilled water 20-30 seconds after instillation. The eyes were monitored for irritation for 4 days after dosing.

No corneal involvement was reported, the irritation reported was of a mild degree and was mostly reversed after 24 hours.

This study is CORE GUIDELINES. The product may be classified as Toxicity Category IV based on eye irritation.

Primary Skin Irritation Study FMC 33297 Permethrin 2% Dust.

FMC Toxicology Lab., #A81-628, November 10, 1981

Six rabbits were prepared by clipping and abrading and were dosed with 0.5 gm of test material (POUNCE 2% Dust, ME W252 E715-91-A) and kept in place for 24 hours.

The primary irritation index for this product was determined to be 0.0/8.0. No irritation resulted.

This study is CORE GUIDELINES. Toxicity Category IV.

Guinea Pig Maximization Test FMC 33297 Permethrin 2% Dust.

FMC Toxicology Laboratory, Somerville, New Jersey; #A81-634, January 26, 1982

Three groups of 10 guinea pigs were prepared for the study and scheduled as test group, positive control, and negative control. The induction phase of this study consisted of making 3 pairs of intradermal injections of the subject material; this was followed 1 week later by a closed patch exposure over the injection sites. The guinea pigs were challenged by application (14-15 days after the second induction) of the test material. In this study the 5 and 10% intradermal injections (with Freund's adjuvant) were made, the closed patch aspect of this study was made by applying the test material as a pulverized powder at 25% concentration in petrolatum. The challenge phase consistent of reapplication of the 25% preparation of the test material in petrolatum.

No indication that the product (2% dust) was a sensitizer resulted. The positive control (dinitrochlorobenzene) gave the expected positive result. Using sodium lauryl sulfate as an enhancer and a rechallenged of the treated areas did not indicate that the product caused sensitization.

This study is CORE MINIMUM. The data do not indicate that the product is a skin sensitizer.

John Doherty, Ph.D.
Toxicology Branch/
Hazard Evaluation Division (TS-769)

4/11/83

TS-769:th/sb TOX/HED:JDoherty:3-27-83: Rm 814 #m26

File last updated 3/21/83

ACCEPTABLE DAILY INTAKE DATA

RAT,Older NOEL mg/kg	ppm	S.F.	ADI mg/kg/day	MPI mg/day(60kg)
5.000	100.00	100	0.0500	3.0000

Published Tolerances

CROP	Tolerance	Food Factor	mg/day(1.5kg)
Cottonseed (oil)(41)	0.500	0.15	0.00112
Eggs(54)	0.050	2.77	0.00208
Poultry(128)	0.050	2.94	0.00221
Celery(28)	5.000	0.29	0.02146
Cabbage,sauerkraut(22)	6.000	0.74	0.06622
Lettuce(84)	20.000	1.31	0.39244
Broccoli(19)	1.000	0.10	0.00153
Brussel Sprouts(20)	1.000	0.03	0.00045
Cauliflower(27)	1.000	0.07	0.00107
Pears(116)	0.050	0.26	0.00019
Potatoes(127)	0.050	5.43	0.00407
Spinach(150)	20.000	0.05	0.01533
Cattle(26)	0.500	7.18	0.05388
Goats(62)	0.500	0.03	0.00023
Hogs(69)	1.000	3.43	0.05151
Horses(208)	0.500	0.03	0.00023
Milk&Dairy Products(93)	0.050	28.62	0.02146
Sheep(145)	0.500	0.19	0.00146

MPI	TMRC	% ADI
3.0000 mg/day(60kg)	0.6369 mg/day(1.5kg)	21.23

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Unpublished,Tox Approved 1E2514,2580,,2377,1F2562,2196,2675,2781

CROP	Tolerance	Food Factor	mg/day(1.5kg)
Kiwi Fruit(204)	2.000	0.03	0.00090
Pears(116)	2.950	0.26	0.01131
Horseradish(77)	1.000	0.03	0.00045
Almonds(1)	0.050	0.03	0.00002
Apples(2)	0.050	2.53	0.00190
Soybeans (oil)(148)	0.050	0.92	0.00069
Peaches(114)	5.000	0.90	0.06745
Corn,sweet(40)	0.100	1.43	0.00215
Cattle(26)	1.500	7.18	0.16165
Goats(62)	1.500	0.03	0.00068
Sheep(145)	1.500	0.19	0.00437
Hogs(69)	1.000	3.43	0.05151
Horses(208)	1.500	0.03	0.00068
Milk&Dairy Products(93)	0.100	28.62	0.04292

MPI	TMRC	% ADI
3.0000 mg/day(60kg)	0.9836 mg/day(1.5kg)	32.79

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Current Action 2F2752

PESTICIDE PRODUCT COVER SHEET

EPA REG. NO. 279 -

PRODUCT NAME POUNCE MUSHROOM DUST (2%)

PROPOSED USE control of insects in mushroom houses

ACTIVE INGREDIENT(S) Permethrin

INERTS

INERT CLEARANCE cleared for proposed use

STUDIES SUPPORTING LABEL:

Study	Result	Tox Cat
Acute Oral LD50	Waived *	—
Acute Dermal LD50	Waived *	—
Eye Irritation	No corneal involvement	IV
Dermal Irritation	0/8.0	IV
Acute Inhalation LC50	Waived *	—
Sensitization	Not a sensitizer	—

SIGNAL WORD CAUTION APPROPRIATE: YES ✓ NO

PRECAUTIONARY STATEMENTS APPROPRIATE: YES ___ NO ✓

RECOMMENDED CHANGES IN PRECAUTIONARY STATEMENTS: Not necessary to put advise to call a physician at such a prominent location on the label, then exaggerates the toxicity

OTHER COMMENTS * Product is similar to POUNCE 25WP and these studies for this product are Tox Cat III, *

Reviewer: John Doherty Date 3/29/83

Code

Pounce® Mushroom Dust
Insecticide

For Agricultural or Commercial Use Only

EPA Reg. No. 279- EPA Est., 279-FL-1

Active Ingredient	
Permethrin.....	2%
Inert Ingredients.....	98%
	100%

*(3-Phenoxyphenyl) methyl (±) *cis-trans* 3-(2,2-dichloroethenyl)-2,2-dimethycyclopropanecarboxylate
**cis/trans* ratio: Max. 55% (±) *cis* and min. 45% (±) *trans*

Pounce®—FMC Trademark U.S. Patent No. 4,024,163

KEEP OUT OF REACH OF CHILDREN

CAUTION

First Aid

If swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or, if available, by administering syrup of ipecac. Do not induce vomiting or give anything by mouth to an unconscious person.

If on skin: Wash with plenty of soap and water. Get medical attention.

If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

For Emergency Assistance Call 716—735-3765.

See Other Panels for Additional Precautionary Information.

FMC Corporation
Agricultural Chemical Group
2000 Market Street
Philadelphia Pennsylvania 19103

PIF 8/82

PRECAUTIONARY TATEMENTS

Hazards to Humans (& Domestic Animals)

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Remove and wash clothing before reuse.

Environmental Hazards

Do not contaminate water by cleaning of equipment, or disposal of wastes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of bags in a sanitary landfill or by incineration if allowed by State and local authorities.

This label must be in the possession of the user at the time of application.

Mushroom Houses and Adjacent Premise Areas

For control of mushroom flies (Sciarid and Phorid adults):

Preparation of the Building Prior to Fogging:

(1) Close all doors, windows and ventilators
(2) Lock or barricade all entrances, turn off pilot lights, post warning signs, and take precautions to prevent persons and animals from entering the area.

Application:

Apply Pounce Mushroom Dust at the rate of 3 pounds (0.06 lb. a.i.) of Pounce Mushroom Dust per standard double (35,000 cu. ft.: 8000 sq. ft.)

Use Pounce Mushroom Dust prior to filling house, during cool-down, during spawning, up to pinning and between breaks. Do not use when mushrooms are present. Treat once daily or as needed when flies appear. Do not make more than 20 applications prior to pinning of first break. Apply no more than two applications between each break. Do not apply more than 30 applications total per crop of 5 breaks.

Do not apply within 24 hours of harvest.

Length of exposure time should be limited to 1 hour, then ventilate the house. Use fans to ventilate in houses that do not have forced air circulation. Wear full-faced gas mask with canister type recommended for general insecticide protection.

Dealers Should Sell In Original Packages Only.

Terms of Sale or Use: On purchase of this product buyer and user agree to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by buyer at his own risk.

Use of Product: FMC's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

Code

Pounce® Mushroom Spraymist
Insecticide

For Agricultural or Commercial Use Only

EPA Reg. No. 279- EPA Est., 279-FL-1

Active Ingredients:	
*Permethrin**	38.4%
Xylene range aromatic solvent	50.2%
Inert Ingredients:	11.4%
	100.0%

*(3-Phenoxyphenyl) methyl (±) *cis-trans* 3-(2,2-dichloroethenyl)-2,2-dimethycyclopropanecarboxylate
**cis/trans* ratio: Max. 56% (±) *cis* and min. 45% (±) *trans*

Contains 3.2 lbs. permethrin per gallon.

Pounce®—FMC Trademark U.S. Patent No. 4,024,163

KEEP OUT OF REACH OF CHILDREN

CAUTION

First Aid:

If in eye, flush eyes with water for 15 minutes. Call a physician.

If swallowed, do not induce vomiting. Call a physician.

If on skin, remove contaminated clothing. Wash with plenty of soap and water. Get medical attention if irritation persists.

Note to Physician: Vomiting should be supervised by a physician or the professional staff because of the possible pulmonary damages by aspiration of the solvent.

For Emergency Assistance Call 715—735-3765.

See Other Panels for Additional Precautionary Information.

FMC

FMC Corporation
Agricultural Chemical Group
2000 Market Street
Philadelphia Pennsylvania 19103

PP 6/82

PRECAUTIONARY STATEMENTS

Hazards to Humans (& Domestic Animals)

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Remove and wash clothing before reuse.

Environmental Hazards

Do not contaminate water by cleaning of equipment, or disposal of wastes.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Storage and Disposal

Do not store below 10° F (-12° C). Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, State, or local procedures. To dispose of container, triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures. Do not cut or weld this container.

This label must be in the possession of the user at the time of application.

MUSHROOM HOUSES AND ADJACENT PREMISE AREAS

For control of mushroom flies (Sciarid and Phorid adults):

Preparation of the Building Prior to Fogging:

(1) Close all doors, windows and ventilators
(2) Lock or barricade all entrances, turn off pilot lights, post warning signs, and take precautions to prevent persons and animals from entering the area.

Application:

Apply Pounce Mushroom Spraymist as a fogging or aerosol treatment at the rate of 2 to 2.5 ounces (0.05-0.0625 lb. a.i.) Pounce Mushroom Spraymist per 30 ounces of water or suitable diluent. Use 1 quart of solution per standard double (35,000 cu. ft.: 8,000 sq. ft.).

Use Pounce Mushroom Spraymist prior to filling house, during cool-down, during spawning, up to pinning and between breaks. Do not use when mushrooms are present. Treat once daily or as needed when flies appear. Do not make more than 20 applications prior to pinning of first break. Apply no more than two applications between each break. Do not apply more than 30 applications total per crop of 5 breaks.

Do not apply within 24 hours of harvest.

Length of exposure time should be limited to 1 hour, then ventilate the house. Use fans to ventilate in houses that do not have forced air circulation. Wear full-faced gas mask with canister type recommended for general insecticide protection.

Dealers Should Sell in Original Packages Only.

Terms of Sale or Use: On purchase of this product buyer and user agree to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by buyer at his own risk.

Use of Product: FMC's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

EPA REG. NO. 279-

PRODUCT NAME POUNCE 25WP

PROPOSED USE No registration is sought at this time

ACTIVE INGREDIENT(S) Permethrin

INERTS

INERT CLEARANCE cleared for use in new agric product

STUDIES SUPPORTING LABEL:

Study	Result	Tox Cat
Acute Oral LD50	1.9 (±0.2) gm/kg - males 1.1 (±0.2) gm/kg - females	III
Acute Dermal LD50	>2.0 gm/kg	III
Eye Irritation	minor corneal involvement - reversed	III
Dermal Irritation	PII = 1.1	IV
Acute Inhalation LC50	>5.38 mg/l	III
Sensitization	No study	—

SIGNAL WORD [redacted] APPROPRIATE: YES___ NO___

PRECAUTIONARY STATEMENTS APPROPRIATE: YES___ NO___

RECOMMENDED CHANGES IN PRECAUTIONARY STATEMENTS:

OTHER COMMENTS No label has been submitted as of March 29, 1983

Reviewer: John Doherty Date 3/29/83

DCR 3-22-83

AGRICULTURAL INERT INGREDIENT CLEARANCE ADVISORY

Please provide one of the following:

Shaughnessey # _____ CAS # _____ Product name _____

Name John Doherty Ptn/Rgstn No. _____

Note: the lower case letters, b, c, d, and e refer to the subsection in 180.1001. The capital letters refer to the alphabetical listing.

Shaughnessey #	Potomac #	CAS #	Chemical or Common Name	180.1001 Clearance
[redacted]				

Inert ingredient information may be entitled to confidential treatment

13544

015394

Chemical:	**1RS,cis-Permethrin**
PC Code:	**209500**
HED File Code	**13000 Tox Reviews**
Memo Date:	**04/11/83**
File ID:	**TX002658**
Accession Number:	**412-03-0015**

HED Records Reference Center
11/22/2002