



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

JAN 30 1992

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Review of Registrant's Response to EEB Review of Data Requirements for Permethrin.

FROM: Douglas Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) 1/30/92

TO: Linda Deluise
Accelerated Reregistration Branch
Special Review and Reregistration Division (H7508W)

The Ecological Effects Branch has reviewed the following comments submitted by ICI and FMC concerning the data requirements for permethrin:

- The registrant requests a waiver of the typical end use product (TEP) data requirements because the adulticide mosquito control use pattern is not a direct application to water.

The EEB requires that toxicity studies with a TEP be submitted for both mosquito adulticide and larvacide use patterns (see subpart E of the 158.220 data requirements). Although label directions may preclude the direct application to or over water, the close proximity to water and the likelihood of depositing some amounts with this use pattern, supports the need for the formulated product testing.

- The registrant requests that it only be required to submit toxicity data from one formulated product not two different formulations, since both the major crop uses and the adulticide mosquito use are considered terrestrial uses.

The formulated products for the major crop uses and the adulticide mosquito control use have substantial differences in their composition. Both the percent active ingredient and the types of inert ingredients in the formulations differ greatly. Therefore, at a minimum, the EEB requires that one mosquito adulticide TEP and one of the TEPs registered for use on major crops, be tested at this time.



The 10% a.i. Permethrin TEP (EPA Reg No. 051793-00046) must be tested to support the mosquito adulticide use pattern because the formulation contains major inert ingredients other than [REDACTED]

The 25.6 % a.i. Permethrin TEP (EPA Reg No. 010182-00018) must be tested to support the outdoor crop use patterns because it is registered for use on major crops such as soybeans, cotton, and corn.

- The registrant requests a waiver of the 72-4(a) Early Life Stage and the 72-5 Life Cycle Data requirement.

The EEB agrees that these data requirements have already been fulfilled (study Accession No. 096699). Therefore, these two studies do not have to be submitted at this time.

For further questions please contact Dan Balluff at 305-6108.

INERT INGREDIENT INFORMATION IS NOT INCLUDED