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DP Barcode: D171784
Shaughnessy No.: 109702
Date Out of EFGWB: DEC 10 1991

TO: Rebecca Cool
Product Manager # 41
Registration Division (H7505C)

FROM: Akiva Abramovitch
Chief, Review Section #3
OPP/EFED/EFGWB (H7507C)

THROUGH: Henry Jacoby, Chief
OPP/EFED/EFGWB (H7507C)

Henry Jacoby

Attached, please find the EFGWB review of:

Reg./File #(s) : 279-3027

Common Name : Cypermethrin

Chemical Name : (+) α -Cyano (3-phenoxyphenyl)methyl (+) cis/trans 3-(2,2-dichloroethenyl)-2,2 dimethylcyclopropane carboxylate

Product Type : Insecticide

Product Name : Ammo

Company Name : FMC Corporation

Purpose : Petition for Emergency Exemption Use on sugarbeets by California.

Date Received: 12/03/91 EFGWB #(s): 92-0268

Date Completed:

Total Reviewing Time: 0.5 day

Deferrals to:

_____ Ecological Effects Branch/EFED
_____ Science Integration & Policy Staff/EFED
_____ Non-Dietary Exposure Branch/HED
_____ Dietary Exposure Branch/HED
_____ Toxicology Branch I, II/HED

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1. CHEMICAL:

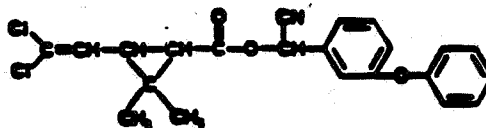
Chemical Name: (+) α -Cyano (3-phenoxyphenyl)methyl (+) cis/trans 3-(2,2-dichloroethenyl)-2,2 dimethylcyclopropane carboxylate

CAS No.: 66841-24-5

Common Name: Cypermethrin

Trade Name: Ammo, Cymbush

Chemical Structure:



Molecular Formula:

Physical/Chemical Properties of Active Ingredient:

Molecular Weight: 416.28

Physical state: crystals

Color: none

Vapor pressure: 6.7×10^{-9} Torr

Water solubility: 0.2 ppm at 20 °C

Octanol/water partition coefficient: N/A

Formulations: Various EC and ULV Formulations

2. TEST MATERIAL: N/A

3. STUDY/ACTION TYPE:

The State of California is applying for an Emergency Exemption for use of cypermethrin on sugar beets to control granulate cutworms. The maximum area to be treated is 20,000 acres.

4. STUDY IDENTIFICATION: N/A

5. REVIEWED BY:

James A. Breithaupt
Agronomist, Review Section #3
OPP/EFED/EFGWB

Signature: James A. Breithaupt
Date: 12/10/91

6. APPROVED BY:

Akiva Abramovitch, Ph.D., Chemist
Chief, Review Section #3
OPP/EFED/EFGWB

Signature: Akiva Abramovitch
Date: DEC 10 1991

7. CONCLUSIONS:

EFGWB cannot support the Emergency Exemption petition since none of the data requirements has been satisfied (see attached EFGWB review). However EFGWB is not aware of any detections of cypermethrin in ground water.

8. RECOMMENDATIONS:

EFGWB cannot support the Emergency Exemption petition for cypermethrin use on sugar beets in Imperial County, California to control the granulate cutworm, since none of the data requirements has been satisfied. However, EFGWB has no reason to seriously object to the petition. The maximum area to be treated (20,000 acres, 5.6 miles by 5.6 miles) does not appear to be environmentally significant. Also, cypermethrin has been registered since 1984 and is yet to be detected in ground water.

9. BACKGROUND:

The State of California Environmental Protection Agency is requesting an Emergency Exemption to use cypermethrin (Ammo 2.5 EC) in sugar beets to control the granulate cutworm (*Feltia subterranea*) in Imperial County, California. The proposed use rates of cypermethrin would be 0.05-0.2 lbs ai/A/application not to exceed 0.6 lbs ai/A/year on a maximum area of 20,000 acres. The State of California has already started using cypermethrin under conditions of the proposed Emergency Exemption on the basis of "declaration of crisis" on 11/08/91.

The submission contained a letter from the Hazard Evaluation Division stating "RCB will disallow future grazing restrictions of sugar beet top grazing and feeding on labels." This accompanying letter was necessary, since the current label specifically prohibits grazing of treated areas or using treated crops as forage.

10. DISCUSSION OF INDIVIDUAL STUDIES: N/A

11. COMPLETION OF ONE-LINER: N/A

12. CBI INDEX: N/A