

192268
RECORD NO.

109702
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 4-03-87 OUT 4.16.87

FILE OR REG. NO. 10182-OA

PETITION OR EXP. NO. _____

DATE OF SUBMISSION 3-12-87

DATE RECEIVED BY HED 4-02-87

RD REQUESTED COMPLETION DATE 4-24-87

EEB ESTIMATED COMPLETION DATE 4-24-87

RD ACTION CODE/TYPE OF REVIEW 192

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

DATA ACCESSION NO(S). _____

PRODUCT MANAGER NO. G. LaRocca (15)

PRODUCT NAME(S) Karate, Permethrin, Cypermiethrin

COMPANY NAME ICI Americas Inc.

SUBMISSION PURPOSE Registrant request for concurrence on
Aquatic Testing Phone Discussion of 2-25-87

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION % A.I.



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

APR 16 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: March 12, 1987 Letter from
ICI Americas, Inc.

FROM: Michael Slimak, Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769C)

TO: George LaRocca
PM Team 15
Registration Division (TS-767C)

This is to confirm that the subject letter accurately reflects a phone call I had with Mr. James Wagner on February 25, 1987. A copy of the ICI letter will be retained in the appropriate EEB chemical file.

192/192268

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 12, 1987

Mr. George T. LaRocca
Product Management Team (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Dear Mr. LaRocca:

RE: Data Call-In Notice for
Ecological Effects Data for Permethrin and Cypermethrin
ICI Response Dated January 20, 1987
KARATE® Insecticide
EPA File Symbol 10182-OA
ICI Letter Dated February 23, 1987
Aquatic Laboratory Study Protocols

On February 19, 1987, ICI representatives met with the Agency to discuss laboratory protocols for the following studies:

- Fish life-cycle study (cypermethrin and KARATE)
- Acute toxicity test for mysid shrimp (permethrin and KARATE)

As a follow-up to our meeting at EPA, Dr. Michael Slimak in a phone conversation of February 25, 1987, with Mr. James Wagner, provided the following answers to our concerns:

1. Fish Life-Cycle Study

Dr. Slimak confirmed that we are correct that neither Guidelines nor SEP ask for (1) fish/egg residue levels, (2) depuration rates, (3) use of radiolabeled compound. However, the Agency now feels that it was an oversight not to have included these as requirements and, therefore, at some unspecified future time, the Guidelines/SEP may be revised to correct the oversight. For now, although the Agency would like a study to provide these data, a study will not be rejected for lack of it.

Until EPA change the Guideline/SEP, we are not obligated to use radiolabeled compound. If radiolabeled material is not used, we are aware that we must be able to provide data on the concentrations of active ingredient in the tanks.

3

ATTN: "Michael SLIMAK"

REGISTRATION DIVISION DATA REVIEW RECORD

Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

33064 HED

4/12/87

1. CHEMICAL NAME

Permethrin - Cypermethrin - KARATE®

2. IDENTIFYING NUMBER

10152-0A

3. ACTION CODE

192

4. ACCESSION NUMBER

N/A

TO BE COMPLETED BY PM

5. RECORD NUMBER

192268

6. REFERENCE NUMBER

1

7. DATE RECEIVED (EPA)

3.17.87

8. STATUTORY DUE DATE

9. PRODUCT MANAGER (PM)

LaRocca 105

10. PM TEAM NUMBER

15

30-DAY TURN-AROUND REQUEST

14. CHECK IF APPLICABLE

- Public Health/Quarantine
- Minor Use
- Substitute Chemical
- Part of IPM
- Seasonal Concern
- Review Requires Less Than 4 Hours

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS

3-24-87

12. PRIORITY NUMBER

43

13. PROJECTED RETURN DATE

4-24-87

15. INSTRUCTIONS TO REVIEWER

- A. HED Total Assessment - 3(c)(5)
- Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
- B. SPRD (Send Copy of Form to SPRD PM)
 - Chemical Undergoing Active RPAR Review
 - Chemical Undergoing Active Registration Standards Review
- C. BFS
- D. TSS/RD
- E. Other

F. INSTRUCTIONS

Refer to the attached info. and respond within 30-DAYS or less

16. RELATED ACTIONS

17. 3(c)(1)(D)

- Use Any or All Available Information
- Use Only Attached Data
- Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.

18. REVIEWS SENT TO

- TB
- EEB
- EF
- PL
- RCB
- EFB
- CH
- BFS

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS	1							
	RESIDUE CHEMISTRY								
	ENVIRONMENTAL DATA								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFS	ECONOMIC ANALYSIS								5

20. Label Submitted with Application Attached

21. Confidential Statement of Formula

22. Representative Labels Showing Accepted Uses Attached

23. Date Returned to RD (to be completed by HED)

24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.