



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

SEP 23 1992

MEMORANDUM

Subject: Response to comments submitted by FMC Corp. for
Cypermethrin minus (129064) and Cypermethrin (109702)

From: Doug Urban, Acting Branch Chief *Urban J. Cook for*
Ecological Effects Branch *09.23.92*
Environmental Fate and Effects Division (H7507C)

To: George LaRocca, PM 13
Registration Division (H7505C)

The Ecological Effects Branch has received the comments concerning the Sheepshead minnow study (MRID No. 419682-12) previously reviewed on 4/2/92. This study was classified as invalid and does not meet the guideline requirements for a flow-through acute toxicity study with estuarine fish. The report was poorly written and inconsistent.

According to our guidelines, variability between the highest measurement and the lowest measurement for each replicate of each nominal concentration cannot vary by more than 1.5. The nominal concentrations of 5.49 $\mu\text{g/L}$ and 3.29 $\mu\text{g/L}$ violate this guideline. However, this study is being used as a comparison between the toxicity of cypermethrin and zeta cypermethrin, and analysis of the dose response data indicates the LC_{50} value is unlikely to change significantly in a new study. We will accept the data for measured concentrations by including all replicates in the calculation of the respective mean concentrations. However, the overall validity of the study will not be changed until the revised report is reviewed.

If there are any questions, contact Renee Lamb at 305-5294.