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

MAR 28 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Comments by EEB on Progress Reports for the  
Cypermethrin Fish Full Life Cycle Study  
Submitted by ICI Americas, Inc.

TO: George La Rocca, PM-15  
Insecticides-Rodenticides Branch  
Registration Division, TS-767c

FROM: Ann Stavola, Aquatic Biologist  
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This memo pertains to the three progress reports dated January 12, 1987, November 25, 1987 and February 23, 1988. The progress reports simply present brief descriptions of the stages of the study completed by the dates of the reports and pertinent preliminary statistical analyses.

EEB cannot comment on the scientific validity of these results as the information provided is not sufficient for us to analyze their results. The January 1987 report states that the survival of hatched fry was relatively lower in one of the solvent control replicates. They stated that this replicate will be excluded from the statistical analysis as they could not explain the low rate of survival. It is imperative that the registrant be reminded that EEB will determine if the data should be used in the statistical analysis and that no data should be omitted from the final report. All raw data must be submitted so that EEB can thoroughly analyze the study.