



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

AUG 3 1989

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: TFP Acid Impurity in Bifenthrin

TO: Mr. George LaRocca, PM 15  
Registration Division (H7505C)

FROM: Byron T. Backus, Toxicologist *Byron T. Backus 7/24/89*  
Fungicide/Herbicide/Antimicrobial Toxicology Branch  
HED (H7509C)

THROUGH: K. Clark Swentzel *K. Clark Swentzel 7/26/89*  
Acting Section Head, Review Section II  
Fungicide/Herbicide/Antimicrobial Toxicology Branch  
HED (H7509C)

and

*M. van Gemert 8/2/89*  
Marcia van Gemert, Ph.D, Branch Chief  
Fungicide/Herbicide/Antimicrobial Toxicology Branch  
HED (H7509C)

EPA Record No. 244478

Project No. 9-1377A

EPA Reg. No. 279-3055

Tox. Chem. 463F, 554C (impurity in 463F)

Action Requested:

FMC Corporation, in a letter to the Agency dated October 3, 1988, has asked the Agency "to expeditiously complete their review of our response to the Toxicology Branch comments..." and "to grant the use of TFP Acid containing the new impurity, thereby permitting the use of Bifenthrin Technical containing TS bifenthrin impurity."

Comments and Recommendations:

1. The Toxicology Branch response to FMC Corporation was contained in a memorandum dated July 28, 1988 (copy attached) in which the CHO/HGPRT assay in question was reclassified as acceptable.

2. With the CHO/HGPRT assay on TS bifenthrin impurity classified as acceptable, and no indications of mutagenic activity for this compound, the registrant has met the requirements previously specified by the Toxicology Branch. HFASB has no objections to use of TFP Acid containing the impurity in question in the manufacture of Bifenthrin Technical which might then contain the same impurity.