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July 31, 2012

Mr. Kelly Ballard
Chemical Review Manager — Dimethoate
Pesticide Re-Evaluation Division
Risk Management and Implementation Branch I
C/O Document Processing Desk (PRD-DCI)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 South Crystal Drive
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Subject: Dimethoate Registration Review – Initial Docket – March 2007
Docket ID No.: EPA-HQ-OPP-2009-0059
Additional Comments from: Cheminova A/S and Cheminova, Inc.

Dear Mr. Ballard:

On behalf of Cheminova (EPA Company Nos. 4787 and 67760), I am submitting three copies each of the following documents to the Agency's registration review docket for Dimethoate (EPA-HQ-OPP-2009-0059):

- Breton, et. al., 2012(a). Cheminova's Comments on EPA's Dimethoate Effects Determination for the California Red-legged Frog. Report prepared for Cheminova by Intrinsic Environmental Sciences, Inc. Final report dated July 27, 2012. 143 p.

MRID: 48895501

- Breton, et. al., 2012(b). Refined Effects Determination for California Red-legged Frog Potentially Exposed to Dimethoate. Assessment and report prepared for Cheminova by Intrinsik Environmental Sciences, Inc. Final Report dated July 27, 2012. 421 p.

MRID: **48895502**

As noted in our letter to the dimethoate registration review docket dated May 18, 2009, Cheminova is entitled to the status of an applicant in the consultation process between EPA and the United States Fish & Wildlife Service ('the Service') concerning potential effects of dimethoate on the California Red-legged frog. On July 9, 2009, we provided the Agency with our initial set of comments on the Agency's assessment for the California Red-legged frog in the following document:

- Moore, D.R.J. (2009). Cheminova's Comments on EPA's Dimethoate Effects Determination for the California Red-legged Frog. Report prepared for Cheminova by Intrinsik Environmental Sciences, Inc. Final report dated July 8, 2009.¹

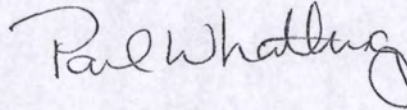
At that time, we asked that those comments be considered by the Agency and by the Service during the consultation process. We are now asking that EPA and the FWS also consider the enclosed set of additional comments as well as our refined assessment of the potential effects of dimethoate on the California red-legged frog. We trust that the Agency will provide the Service with copies of these new documents.

Cheminova appreciates the opportunity to provide these comments for consideration during the registration review process for dimethoate, and we look forward to working with EPA and the Service concerning the effects determination for the CRLF.

¹ Note that EPA never provided an MRID for this set of comments. We respectfully request that EPA assign an MRID to this report to promote easier tracking and citation.

If you have any questions, or for additional information, please feel free to contact me at (703) 383-8883 (x1).

Sincerely,



Paul Whatling

Director of Regulatory Science

Cheminova, Inc.

EPA Agent for Cheminova A/S

c: Kristian Lystbæk, Cheminova A/S
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