

US EPA ARCHIVE DOCUMENT

Sumitomo Chemical Company, Ltd. - Phase 3 - Tetramethrin/RR-1
Page 1 of 10 //

**REREGISTRATION PHASE 3 RESPONSE
FOR TETRAMETHRIN**
Company No. 10308, Chemical No. 69003
Case No. 2660

Volume 1

PHASE 3 CHEMICAL RESPONSE WORKSHEET

Date Submitted

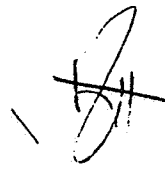
May 25, 1990

Submitted by

Sumitomo Chemical Company, Ltd.
5-33, Katahama 4-Chome, Chuo-Ku
Osaka 541, Japan

Prepared by

McKenna, Conner & Cuneo
1575 Eye Street, N.W.
Washington, D.C. 20005



Introduction

This Phase 3 submission identifies all of the data that Sumitomo Chemical Company is relying upon to support and maintain the reregistration of tetramethrin. In determining whether to reregister tetramethrin, the Agency will consider all information relevant to the risks and benefits of the product. Sumitomo is relying on fifty-two (52) items of data, as identified in Volume 15 of this response, to demonstrate that tetramethrin does not generally cause unreasonable adverse effects on the environment.

In addition, Sumitomo is submitting summaries of fourteen (14) specific studies. While the summarized studies are those that were conducted in compliance with the Agency's most recent guidelines, all of the data in Volume 15 provide important information relevant to the risk-benefit determination. For example, the December 11, 1989 weight of evidence classification of tetramethrin by the Peer Review Committee of the Office of Pesticide programs is based on a consideration of many items of data relevant to the risk determination but not summarized for the purpose of this Phase 3 response. All of the data identified in this Phase 3 submission should be acknowledged as information which supports the reregistration of the product.

CHANGES MADE TO REREGISTRATION PHASE 3 WORKSHEET

CASE: 2660
CHEMICAL: 069003
COMPANY: 010308

CHANGES MADE BY: Norman Spurling
DATE: 8/2/90

GDLN 82-1(a) :

The submitter provided a study not previously submitted. This study will be processed into PDMS as an independent MRID rather than as a normal Phase 3 Summary or Reformat. It has been assigned MRID 92181003 for processing. Since it is not a summary of a previously existing MRID, we have removed the 'X' from column 7.

BEST AVAILABLE COPY

#3

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | | |
|---------------------------|---------------------------------|----------------------|
| Company Number / Name | SUMITOMO CHEMICAL COMPANY, LTD. | |
| 010308 / Address | BALTIMORE, MD | |
| Chemical Number / Name | 069003 Tetramethrin | |
| Case Number / EPA Manager | 2660 Linda DeLuise | Use Pattern IKMNO |

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|---------|--|------------------------------|------------------|------|
| B | 61-1 | Chemical Identity | Y R 1 | | |
| | 61-1 | Chemical Identity | 41609601 | Not Yet Reviewed | |
| | 61-1 | Chemical Identity | 41609615 | Not Yet Reviewed | |
| B | 61-2(a) | Begin. mat. & mnfg. | Y R 1 | | |
| | 61-2(a) | Begin. mat. & mnfg. | 41609601 | Not Yet Reviewed | |
| | 61-2(a) | Begin. mat. & mnfg. | 41609615 | Not Yet Reviewed | |
| B | 61-2(b) | Discussion of Impuri | Y R 1 | | |
| | 61-2(b) | Discussion of Impuri | 41609601 | Not Yet Reviewed | |
| | 61-2(b) | Discussion of Impuri | 41609615 | Not Yet Reviewed | |
| D | 62-1 | Preliminary Analysis | Y CR 1 | | |
| | 62-1 | Preliminary Analysis | 41609602 | Upgradable | |
| | | Comments: PROVIDE A DESCRIPTION OF HOW IMPURITY NUMBER 5 COULD BE FORMED. ALTHOUGH [REDACTED] WAS NOT FOUND, A DISCUSSION OF HOW IT COULD BE FORMED IS NEEDED. THE AGENCY REQUIRES A G.S. (SPECTROGRAPH) FOR TECHNICAL GRADE TETRAMETRIN IDENTIFYING EACH PEAK OF 0.1% OR GREATER. ON PAGE 102047 THE IMPURITY LISTED IS "A" RATHER THAN "E". FURTHER EXPLANATION IS NEEDED. | | | |
| | 62-1 | Preliminary Analysis | 42014401 | Not Yet Reviewed | |
| | | Comments: DATA SENT 9/20/91 TO UPDATE MRID 41609602. | | | |
| B | 62-2 | Certification of lim | Y R 1 | | |
| | 62-2 | Certification of lim | 41609602 | Not Yet Reviewed | |

(NEP) INGREDIENT INFORMATION IS NOT INCLUDED

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

| | | | | | |
|---|------|-------------------|----------|------------------|--|
| B | 62-3 | Analytical Method | Y R 1 | | |
| | 62-3 | Analytical Method | 41609602 | Not Yet Reviewed | |
| | 62-3 | Analytical Method | 42014401 | Not Yet Reviewed | |

Comments: SUPPLEMENTAL DATA FOR MRID 41609602.

| | | | | | |
|---|------|----------------|----------|------------------|--|
| B | 63-2 | Color | Y R 1 | | |
| | 63-2 | Color | 41609603 | Not Yet Reviewed | |
| B | 63-3 | Physical State | Y R 1 | | |
| | 63-3 | Physical State | 41609602 | No Decision Yet | |
| | 63-3 | Physical State | 41609603 | Not Yet Reviewed | |
| B | 63-4 | Odor | Y R 1 | | |
| | 63-4 | Odor | 41609603 | Not Yet Reviewed | |
| B | 63-5 | Melting Point | Y R 1 | | |
| | 63-5 | Melting Point | 41609603 | Not Yet Reviewed | |
| D | 63-6 | Boiling Point | R 1 | | |

Comments: THIS DATA REQUIREMENT WAS WAIVED IN PHASE 2.

| | | | | | |
|--|------|---------------|----------|-----------------|--|
| | 63-6 | Boiling Point | 40528901 | No Decision Yet | |
|--|------|---------------|----------|-----------------|--|

Comments: THE AGENCY CANNOT DETERMINE IF THE STUDY IS ADEQUATE BECAUSE THE TEST METHOD WAS NOT IDENTIFIED.

| | | | | | |
|--|------|---------------|----------|------------------|--|
| | 63-6 | Boiling Point | 42014401 | Not Yet Reviewed | |
|--|------|---------------|----------|------------------|--|

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Comments: SENT TO UPGRADE ON 9/20/91.

| | | | | | |
|---|------|---------|----------|-----------------|--|
| D | 63-7 | Density | Y R 1 | | |
| | 63-7 | Density | 40528901 | No Decision Yet | |

Comments: SEE COMMENT FOR 63-6.

| | | | | | |
|--|------|---------|----------|------------------|--|
| | 63-7 | Density | 41609602 | Not Yet Reviewed | |
| | 63-7 | Density | 41609603 | Not Yet Reviewed | |
| | 63-7 | Density | 42014401 | Not Yet Reviewed | |

Comments: SENT TO UPGRADE 9/20/91.

| | | | | | |
|---|------|------------|----------|------------------|--|
| D | 63-8 | Solubility | Y R 1 | | |
| | 63-8 | Solubility | 41609602 | Not Yet Reviewed | |
| | 63-8 | Solubility | 41609603 | Not Yet Reviewed | |
| | 63-8 | Solubility | 41732801 | Upgradable | |

Comments: SEE COMMENT 63-6.

| | | | | | |
|--|------|------------|----------|------------------|--|
| | 63-8 | Solubility | 42014401 | Not Yet Reviewed | |
|--|------|------------|----------|------------------|--|

Comments: SENT TO UPGRADE 9/20/91.

| | | | | | |
|---|------|----------------|----------|-----------------|--|
| D | 63-9 | Vapor Pressure | Y R 1 | | |
| | 63-9 | Vapor Pressure | 40572001 | No Decision Yet | |

Comments: SEE COMMENT 63-6.

6

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|------------------------------------|--------|----------------------|------------------------------|------------------|------|
| | 63-9 | Vapor Pressure | 41609603 | Not Yet Reviewed | |
| | 63-9 | Vapor Pressure | 42014401 | Not Yet Reviewed | |
| Comments: SENT TO UPGRADE 9/20/91. | | | | | |
| B | 63-10 | Dissociation Constan | R | | |
| D | 63-11 | Oct/Water partition | Y CR 1 | | |
| | 63-11 | Oct/Water partition | 40248901 | No Decision Yet | |
| Comments: SEE COMMENT 63-6. | | | | | |
| | 63-11 | Oct/Water partition | 41732802 | Not Yet Reviewed | |
| | 63-11 | Oct/Water partition | 42014401 | Not Yet Reviewed | |
| Comments: SENT 9/20/91 TO UPGRADE. | | | | | |
| D | 63-12 | pH | Y CR 1 | | |
| | 63-12 | pH | 41064901 | No Decision Yet | |
| Comments: SEE COMMENT 63-6. | | | | | |
| | 63-12 | pH | 41609603 | Not Yet Reviewed | |
| | 63-12 | pH | 42014401 | Not Yet Reviewed | |
| Comments: UPGRADE 9/20/91. | | | | | |
| D | 63-13 | Stability | Y R 1 | | |
| | 63-13 | Stability | 40528901 | No Decision Yet | |

7

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Comments: SEE COMMENT 63-6.

| | | | | | |
|--|-------|-----------|----------|------------------|--|
| | 63-13 | Stability | 41609603 | Not Yet Reviewed | |
| | 63-13 | Stability | 42014401 | Not Yet Reviewed | |

Comments: UPGRADE 9/20/91.

| | | | | | |
|---|---------|----------------------|----------|------------------|--|
| B | 63-14 | Oxidizing/Reducing A | CR | | |
| B | 63-15 | Flammability | CR | | |
| B | 63-16 | Explodability | R | | |
| B | 63-17 | Storage stability | Y R 1 | | |
| | 63-17 | Storage stability | 41995001 | Not Yet Reviewed | |
| B | 63-18 | Viscosity | CR | | |
| B | 63-19 | Miscibility | CR | | |
| B | 63-20 | Corrosion characteri | Y R 1 | | |
| | 63-20 | Corrosion characteri | 41995002 | Not Yet Reviewed | |
| B | 63-21 | Dielectric breakdown | CR | | |
| B | 71-1(a) | Acute avian oral qua | Y R 1 | | |
| | 71-1(a) | Acute avian oral qua | 41609604 | Fully Accept | |

Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. WITH AN LD50 OF GREATER THAN 2250 MG/KG, THE TEST MATERIAL IS CONSIDERED TO BE PRACTICALLY NON-TOXIC TO BOBWHITE QUAIL. THE NOEC WAS 2250 MG/KG. A COPY OF THE DER WAS SENT IN MAY 1992.

8

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--|---------|----------------------|------------------------------|--------------|------|
| B | 71-1(b) | Acute avian oral qua | CR | | |
| B | 71-2(a) | Acute avian diet. qu | Y R 1 | | |
| | 71-2(a) | Acute avian diet. qu | 41609605 | Fully Accept | |
| <p>Comments: THIS GUIDELINE IS SATISFIED. BASED UPON NOMINAL CONCENTRATIONS, DIETARY LC50 OF NEO-PYNAMIN WAS GREATER THAN 5620 PPM. THIS VALUES CLASSIFIES NEO-PYNAMIN AS PRACTICALLY NON-TOXIC TO BOBWHITE CHICKS. THE NOEC WAS 5620 PPM. A COPY OF THE DER WAS SENT IN MAY 1992.</p> | | | | | |
| B | 71-2(b) | Acute avian diet. du | Y R 1 | | |
| | 71-2(b) | Acute avian diet. du | 41609606 | Fully Accept | |
| <p>Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE DER WAS SENT IN MAY 1992.</p> | | | | | |
| B | 71-3 | Wild mammal toxicity | CR | | |
| B | 71-4(a) | Avian repro. quail | CR | | |
| B | 71-4(b) | Avian repro. duck | CR | | |
| B | 71-5(a) | Simulated field stud | CR | | |
| B | 71-5(b) | Actual field study | CR | | |
| B | 72-1(a) | Fish toxicity bluegi | Y R 1 | | |
| | 72-1(a) | Fish toxicity bluegi | 41609607 | Fully Accept | |
| <p>Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. BASED ON A MEAN MEASURED CONCENTRATIONS, THE 96-HOUR LC50 WAS 15.9 UG/L. THEREFORE, NEO-PYNAMIN IS CLASSIFIED AS VERY HIGHLY TOXIC TO BLUEGILL. THE NOEC</p> | | | | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

MRID Comments Continued:

COULD NOT BE DETERMINED DUE TO THE PRESENCE OF SUBLETHAL EFFECTS AT ALL TEST CONCENTRATIONS. A COPY OF THE DER WAS SENT MAY 1992.

| | | | | | |
|---|---------|----------------------|----------|--------------|--|
| B | 72-1(b) | Fish toxicity bluegi | CR | | |
| B | 72-1(c) | Fish toxicity rainbo | R 1 | | |
| | 72-1(c) | Fish toxicity rainbo | 41609608 | Fully Accept | |

Comments: THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. BASED ON MEAN MEASURED CONCENTRATIONS, THE 96-HOUR LC50 WAS 3.7 UG/L. THE NOEC WAS ESTIMATED AS 2.2 UG/L. A COPY OF THE DER WAS SENT IN MAY 1992.

| | | | | | |
|---|---------|----------------------|----------|-----------|--|
| B | 72-1(d) | Fish toxicity rainbo | CR | | |
| B | 72-2(a) | Invertebrate toxicit | Y R 1 14 | | |
| | 72-2(a) | Invertebrate toxicit | 41609609 | Deficient | |

Comments: TEST CONCENTRATIONS MEASURED AT 0 AND 48 HOURS WERE GREATLY DIFFERENT. THE ACTUAL CONCENTRATIONS THE DAPHIDS WERE EXPOSED TO ARE UNKNOWN. BASED ON MEAN MEASURED CONCENTRATIONS, THE 48-HOUR LC50 WAS 0.045 MG/L. THEREFORE, NEO-PYNAMIN IS CLASSIFIED AS VERY HIGHLY TOXIC TO DAPHNIA MAGNA. THE NOEC WAS ESTIMATED AS 0.024 MG/L. A NEW STUDY IS DUE MAY 31, 1993. A COPY OF THE DER WAS SENT IN MAY 1992.

| | | | | | |
|--|---------|----------------------|------|--------------|--|
| | 72-2(a) | Invertebrate toxicit | Misc | Fully Accept | |
|--|---------|----------------------|------|--------------|--|

Comments: EEB HAS CLASSIFIED MRID 41609609 AS SUPPLEMENTAL BUT THE STUDY MUST BE REPEATED ONLY IF AND WHEN THE LIMITED OUTDDOR USE PATTERNS ARE EXPANDED, NECESSITATING A REEVALUATION OF THE EXISTING RISKS TO

U.S. Environmental Protection Agency
Phase 3 Data Dump
11/23/93

Pg. 8

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Correspondence Comments Continued:
INVERTEBRATES.

| | | | | | |
|---|---------|----------------------|----------|------------------|--|
| B | 72-2(b) | Invertebrate toxicit | CR | | |
| B | 72-3(a) | Estu/mari tox. fish | CR | | |
| B | 72-3(b) | Estu/mari tox. mollu | CR | | |
| B | 72-3(c) | Estu/mari tox. shrim | CR | | |
| B | 72-3(d) | Estu/mari tox. fish | CR | | |
| B | 72-3(e) | Estu/mari tox. mollu | CR | | |
| B | 72-3(f) | Estu/mari tox. shrim | CR | | |
| B | 72-4(a) | Early life stage fis | CR | | |
| B | 72-4(b) | Life cycle invertebr | CR | | |
| B | 72-5 | Life cycle fish | CR | | |
| B | 72-6 | Aquatic org. accumul | CR | | |
| B | 72-7(a) | Simul. field-aquatic | CR | | |
| B | 72-7(b) | Actual field-aquatic | CR | | |
| B | 81-1 | Acute oral tox. rat | Y R 1 | | |
| | 81-1 | Acute oral tox. rat | 41609610 | Not Yet Reviewed | |
| | 81-1 | Acute oral tox. rat | 42146405 | Fully Accept | |

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

| | | | | | |
|---|------|----------------------------------|--|-----------------|--|
| B | 81-2 | Acute dermal tox. ra Y R 1 | | | |
| | 81-2 | Acute dermal tox. ra 40276101 | | No Decision Yet | |
| | 81-2 | Acute dermal tox. ra 92181001-Su | | | |
| | 81-2 | Acute dermal tox. ra 42146405 | | Fully Accept | |

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

| | | | | | |
|---|------|----------------------------------|--|-----------------|--|
| B | 81-3 | Acute inhal. tox rat Y R 1 | | | |
| | 81-3 | Acute inhal. tox rat 41492101 | | No Decision Yet | |
| | 81-3 | Acute inhal. tox rat 92181002-Su | | | |
| | 81-3 | Acute inhal. tox rat 42146405 | | Fully Accept | |

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

| | | | | | |
|---|------|---------------------------------|--|------------------|--|
| B | 81-4 | Primary eye irritation Y R 1 | | | |
| | 81-4 | Primary eye irritation 41609611 | | Not Yet Reviewed | |
| | 81-4 | Primary eye irritation 42146405 | | Fully Accept | |

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

| | | | | | |
|---|------|-------------------------------|--|------------------|--|
| B | 81-5 | Primary dermal irrit Y R 1 | | | |
| | 81-5 | Primary dermal irrit 41609611 | | Not Yet Reviewed | |
| | 81-5 | Primary dermal irrit 42146405 | | Fully Accept | |

12

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

| | | | | | |
|---|------|-------------------------------|--|------------------|--|
| B | 81-6 | Dermal sensitization Y R 1 | | | |
| | 81-6 | Dermal sensitization 41609612 | | Not Yet Reviewed | |
| | 81-6 | Dermal sensitization 42146405 | | Fully Accept | |

Comments: OUR AUGUST 1992 LETTER ACCEPTED THIS STUDY. A COPY OF THE DER WAS SENT.

| | | | | | |
|---|---------|-------------------------------|--|------------------|--|
| B | 81-7 | Acute delayed neurot CR | | | |
| B | 82-1(a) | 90-day feeding-roden CR 1 | | | |
| | 82-1(a) | 90-day feeding-roden 41698905 | | Not Yet Reviewed | |
| | 82-1(a) | 90-day feeding-roden 42146404 | | Deficient | |
| B | 82-1(b) | 90-day feeding-nonro CR 1 | | | |
| | 82-1(b) | 90-day feeding-nonro 41698902 | | Not Yet Reviewed | |
| | 82-1(b) | 90-day feeding-nonro 42146404 | | Deficient | |
| B | 82-2 | 21-day dermal-rabbit Y CR 1 | | | |
| | 82-2 | 21-day dermal-rabbit 41995004 | | Fully Accept | |

Comments: LETTER SENT 6/93. DER SENT.

| | | | | | |
|---|------|-------------------------------|--|-----------|----------|
| | 82-2 | 21-day dermal-rabbit 42146404 | | Deficient | |
| B | 82-3 | 90-day dermal-rodent CR | | | |
| B | 82-4 | 90-day inhal.-rat Y CR 1 | | | 06/30/95 |

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--|----------------------|------------------------------|------------------|------|
| | 82-4 | 90-day inhal.-rat | 41995003 | Upgradable | |
| | Comments: LETTER AND DER SENT 6/93. | | | | |
| | 82-4 | 90-day inhal.-rat | 42012101 | Upgradable | |
| | Comments: LETTER AND DER SEMT 6/93. | | | | |
| | 82-4 | 90-day inhal.-rat | 42146404 | Deficient | |
| B | 82-5(a) | 90-day neurotox-hen | CR | | |
| B | 82-5(b) | 90-day neurotox-mamm | CR | | |
| | Comments: A SPECIAL SCREENING BATTERY IS REQUIRED IN LIEU OF THE STANDARD 90-DAY STUDY. SEE COMMENTS AT THE END OF THE ADDENDUM. | | | | |
| B | 83-1(a) | Chronic tox-rodent | Y CR 1 | | |
| | 83-1(a) | Chronic tox-rodent | 158951 | No Decision Yet | |
| | 83-1(a) | Chronic tox-rodent | 92181004-Su | | |
| | 83-1(a) | Chronic tox-rodent | 40276301 | No Decision Yet | |
| | 83-1(a) | Chronic tox-rodent | 92181004-Su | | |
| | 83-1(a) | Chronic tox-rodent | 40280401 | No Decision Yet | |
| | 83-1(a) | Chronic tox-rodent | 92181004-Su | | |
| | 83-1(a) | Chronic tox-rodent | 41723301 | Not Yet Reviewed | |
| | 83-1(a) | Chronic tox-rodent | 41723302 | Not Yet Reviewed | |
| B | 83-1(b) | Chronic tox - non-ro | Y CR 1 | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|---|----------------------|------------------------------|------------------|------|
| | 83-1(b) | Chronic tox - non-ro | 42189301 | Fully Accept | |
| | Comments: OUR DECEMBER 1992 ACCEPTED THIS STUDY. NOEL=300 MG/KG/DAY (HDT). A COPY OF THE DER WAS SENT. THIS GUIDELINE IS FULFILLED. | | | | |
| B | 83-2(a) | Oncogenicity - rat | CR 1 | | |
| | 83-2(a) | Oncogenicity - rat | 41698904 | Not Yet Reviewed | |
| | 83-2(a) | Oncogenicity - rat | 41723301 | Not Yet Reviewed | |
| B | 83-2(b) | Oncogenicity-mouse | Y CR 1 | | |
| | 83-2(b) | Oncogenicity-mouse | 158951 | No Decision Yet | |
| | 83-2(b) | Oncogenicity-mouse | 92181004-Su | | |
| | 83-2(b) | Oncogenicity-mouse | 40276301 | No Decision Yet | |
| | 83-2(b) | Oncogenicity-mouse | 92181004-Su | | |
| | 83-2(b) | Oncogenicity-mouse | 40280401 | No Decision Yet | |
| | 83-2(b) | Oncogenicity-mouse | 92181004-Su | | |
| | 83-2(b) | Oncogenicity-mouse | 41698901 | Not Yet Reviewed | |
| | 83-2(b) | Oncogenicity-mouse | 41698904 | Not Yet Reviewed | |
| D | 83-3(a) | Teratogenicity - rat | Y CR 1 | | |
| | 83-3(a) | Teratogenicity - rat | 114369 | Upgradable | |
| | Comments: PERCENT PURITY OF THE TECHNICAL MATERIAL WAS NOT CLEARLY IDENTIFIED. IF THE DATA CAN BE SUPPLIED, THEN STUDY CAN BE UPGRADED. | | | | |
| | 83-3(a) | Teratogenicity - rat | 92181006-Su | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

83-3(a) Teratogenicity - rat 42014402 Fully Accept

Comments: THIS STUDY WAS SUBMITTED TO UPGRADE MRID 114369. SENT FOR REVIEW ON 9/20/91. AS STATED IN OUR NOVEMBER 1991 LETTER THIS STUDY UPGRADES MRID 114369. THIS GUIDELINE IS SATISFIED. A COPY OF THE DER WAS SENT.

83-3(a) Teratogenicity - rat 42189201 Fully Accept

Comments: THIS SUBMISSION INCLUDED BOTH A RANGE FINDING STUDY AND A MAIN STUDY. THESE STUDIES WERE INITIATED TO FULFILL A REQUEST BY CALIFORNIA REGULATORY AUTHORITIES. THE REGISTRANT WANTED THE AGENCY TO HAVE AN EQUIVALENT DATA BASE TO THAT OF CALIFORNIA. THESE STUDIES ARE ACCEPTABLE. THE MATERNAL NOEL IS 500 MG/KG/DAY AND THE LEL WAS 1000 MG/KG/DAY WITH DECREASED BODY WEIGHT GAIN (42.8%) AND DECREASED FOOD CONSUMPTION (10.7%) OCCURRING DURING DAYS 6-9 OF GESTATION. THE DEVELOPMENTAL NOEL IS 1000 MG/KG/DAY (HDT). DOSE LEVELS WERE 0, 150, 500, AND 1000 MG/KG/DAY. A COPY OF THE DER WAS SENT.

83-3(a) Teratogenicity - rat 42189202 Fully Accept

Comments: SEE COMMENTS FOR MRID 42189201.

B 83-3(b) Teratogenicity - rab Y CR 1

83-3(b) Teratogenicity - rab 41995005 Fully Accept

Comments: LETTER AND DER SENT 6/93.

83-3(b) Teratogenicity - rab 42878001 Fully Accept

Comments: LETTER AND REVIEW SENT 9/15/93.

16

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|---|----------------------|------------------------------|-----------------|------|
| | 83-3(b) | Teratogenicity - rab | 42878002 | Fully Accept | |
| | Comments: LETTER AND REVIEW SENT 9/15/93. | | | | |
| D | 83-4 | 2-generation repro.- | CR 1 14 | | |
| | 83-4 | 2-generation repro.- | 161842 | No Decision Yet | |
| | 83-4 | 2-generation repro.- | 92181007-Su | | |
| | 83-4 | 2-generation repro.- | 40777801 | Fully Accept | |
| | Comments: SINCE THIS STUDY WAS CONDUCTED USING NEOPYNAMIN FORTE RATHER THAN TETRAMETRIN, YOU MUST SUBMIT TOXICITY DATA AND/OR METABOLISM STUDIES COMPARING NEOPYNAMIN FORTE TO TETRAMETRIN BEFORE WE CAN DETERMINE WHETHER THIS STUDY CAN BE USED IN SUPPORT OF THIS GUIDELINE. PROVIDED BY MRIDS 4214601 THRU 06 AND 42161501 AND 02. OUR LETTER OF AUGUST 1992 ACCEPTED THESE AS BRIDGING THE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 92181007-Su | | |
| | 83-4 | 2-generation repro.- | 42146401 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42146402 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42146403 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|---|----------------------|------------------------------|-----------------|------|
| | 83-4 | 2-generation repro.- | 42146404 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42146405 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42146406 | Upgradable | |
| | Comments: SED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42161501 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | 42161502 | Upgradable | |
| | Comments: USED TO BRIDGE DATA. | | | | |
| | 83-4 | 2-generation repro.- | Analog | Fully Accept | |
| | Comments: BRIDGING ARGUMENT. POSSIBLE TIME EXTENSION. SENT 6/16/92. ACCEPTED IN OUR AUGUST 1992 LETTER. | | | | |
| B | 84-2(a) | Gene mutation-ames | Y R 1 | | |
| | 84-2(a) | Gene mutation-ames | 40275801 | No Decision Yet | |
| | 84-2(a) | Gene mutation-ames | 92181009-Su | | |
| | 84-2(a) | Gene mutation-ames | 40276001 | No Decision Yet | |
| | 84-2(a) | Gene mutation-ames | 92181008-Su | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--|---------|----------------------------------|------------------------------|-----------------|----------|
| B | 84-2(b) | Struct. chrom. aberr Y R 1 | | | |
| | 84-2(b) | Struct. chrom. aberr 40275901 | | Deficient | |
| Comments: THIS STUDY IS INADEQUATE. HOWEVER, OTHER DATA EXISTS FOR THIS GUIDELINE. ONLY MALE MICE WERE USED AND TARGET CELLS WERE NOT REACHED. | | | | | |
| | 84-2(b) | Struct. chrom. aberr 92181012-Su | | | |
| | 84-2(b) | Struct. chrom. aberr 41227201 | | No Decision Yet | |
| | 84-2(b) | Struct. chrom. aberr 41347801 | | No Decision Yet | |
| | 84-2(b) | Struct. chrom. aberr 92181010-Su | | | |
| | 84-2(b) | Struct. chrom. aberr 41347802 | | No Decision Yet | |
| | 84-2(b) | Struct. chrom. aberr 92181011-Su | | | |
| B | 84-4 | Other genotoxic effe Y R 1 14 | | | 06/30/95 |
| | 84-4 | Other genotoxic effe 40778401 | | No Decision Yet | |
| | 84-4 | Other genotoxic effe 92181013-Su | | | |
| | 84-4 | Other genotoxic effe 42414401 | | Deficient | |
| Comments: OUR 6/93 LETTER REJECTED THIS STUDY. | | | | | |
| | 84-4 | Other genotoxic effe 42414402 | | Deficient | |
| Comments: OUR 6/93 LETTER REJECTED THIS STUDY. | | | | | |
| | 84-4 | Other genotoxic effe 42414403 | | Deficient | |
| Comments: OUR 6/93 LETTER REJECTED THIS DATA. | | | | | |

19

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|----------|--|------------------------------|--------------|------|
| | 84-4 | Other genotoxic effe Protocol | | Fully Accept | |
| | | Comments: OUR LETTER DATED NOVEMBER 1991 ACCEPTS YOUR PROTOCOL DATED AUGUST 9, 1991. | | | |
| B | 85-1 | General metabolism | Y CR 1 | | |
| | | Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION IS GRANTED TO AUGUST 24, 1992. | | | |
| | 85-1 | General metabolism | 42448901 | Fully Accept | |
| | | Comments: OUR LETTER ACCEPTED THIS DATA IN 5/93. | | | |
| | 85-1 | General metabolism | 42448902 | Fully Accept | |
| | | Comments: OUR LETTER ACCEPTED THIS DATA IN 5/93. | | | |
| B | 85-2 | Dermal penetration | CR | | |
| B | 86-1 | Domestic animal safe | CR | | |
| B | 122-1(a) | Seed germ/seedling e | cr | | |
| B | 122-1(b) | Vegetative vigor | cr | | |
| B | 122-2 | Aquatic plant growth | cr | | |
| B | 123-1(a) | Seed germ/seedling e | cr | | |
| B | 123-1(b) | Vegetative vigor | cr | | |
| B | 123-2 | Aquatic plant growth | cr | | |
| B | 124-1 | Terrestrial field | cr | | |

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|----------|---|------------------------------|--------------|------|
| B | 124-2 | Aquatic field | cr | | |
| B | 132-1(a) | Foliar residue dissi | cr | | |
| | | Comments: THIS DATA REQUIREMENT IS RESERVED. | | | |
| B | 132-1(b) | Soil residue dissipa | cr | | |
| | | Comments: THIS DATA REQUIREMENT IS RESERVED. | | | |
| B | 133-3 | Dermal passive dosim | cr | | |
| | | Comments: THIS DATA REQUIREMENT IS RESERVED. | | | |
| B | 133-4 | Inhal. passive dosim | cr | | |
| | | Comments: THIS DATA REQUIREMENT IS RESERVED. | | | |
| B | 141-1 | Honey bee acute cont Y | CR 1 | | |
| | 141-1 | Honey bee acute cont | 41609613 | Fully Accept | |
| | | Comments: THIS STUDY SHOWS NEO-PYNAMIN TO BE HIGHLY TOXIC TO HONEY BEES. IN AN ACUTE CONTACT TEST, THE LD50 WAS DETERMINED TO BE APPROXIMATELY 0.155 MICROGRAMS PER BEE. THIS STUDY SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE DER WAS SENT IN MAY 1992. | | | |
| B | 141-2 | Honey bee residue on Y | CR 1 14 | | |
| | 141-2 | Honey bee residue on | 41940801 | Fully Accept | |
| | | Comments: THE DATA SHOW THAT FOLIAR RESIDUES OF NEO-PYNAMIN DO NOT PRESENT A HAZARD TO HONRY BEES WHEN THE PRODUCT IS APPLIED AT ONE LINEAR FOOT PER SECOND. THIS STUDY | | | |

21

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

MRID Comments Continued:

SATISFIES THIS GUIDELINE REQUIREMENT. A COPY OF THE DER WAS SENT ON JUNE 9, 1992.

141-2 Honey bee residue on 42023701 No Decision Yet

Comments: THIS IS AN AMMENDMENT TO MRID 41940801. THIS AMENDMENT WAS SUBMITTED TO PROVIDE ANALYTICAL DATA. THE AMENDMENT SIMPLY INDICATES THAT NO SUITABLE METHOD WAS ESTABLISHED FOR ANALYSIS OF TETRAMETHRIN RESIDUES ON ALFALFA. IN ANY CASE, ANALYTICAL DATA WERE NOT ESSENTIAL TO EVALUATION OF THE FOLIAR RESIDUE STUDY. REVIEW DATED SEPTEMBER 17, 1992.

141-2 Honey bee residue on Time Ext Fully Accept

Comments: A TIME EXTENSION IS GRANTED TO JULY 15, 1991 DUE TO TECHNICAL DIFFICULTIES INCURRED IN CONDUCTING THE STUDY.

B 141-5 Field test for polli CR

B 160-5 Chemical identity Y R 1

160-5 Chemical identity 41609614 Not Yet Reviewed

B 161-1 Hydrolysis Y R 1

Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION TO AUGUST 24, 1991 IS GRANTED.

161-1 Hydrolysis 41995006 Not Yet Reviewed

D 161-2 Photodegradation-wat 14 Required

161-2 Photodegradation-wat Waiver Not Yet Reviewed

22

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Comments: ON AUGUST 30, 1991 A WAIVER WAS REQUESTED AND SENT FOR REVIEW ON 9/6/91. OUR NOVEMBER 1992 LETTER ACCEPTED THIS WAIVER.

| | | | | | |
|---|-------|-------------------------------|--|--|--|
| B | 161-3 | Photodegradation-soi | | | |
| B | 161-4 | Photodegradation-air cr | | | |
| B | 162-1 | Aerobic soil metabol Y R 1 14 | | | |

Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION IS GRANTED TO AUGUST 24, 1992.

| | | | | | |
|--|-------|-------------------------------|--|------------------|--|
| | 162-1 | Aerobic soil metabol 42563301 | | Not Yet Reviewed | |
| | 162-1 | Aerobic soil metabol Time Ext | | Fully Accept | |

Comments: Requested on 8/7/92. Extension until 11/24/92. GRANTED ON 11/5/92.

| | | | | | |
|---|-------|-------------------------------|--|------------------|--|
| B | 162-2 | Anaerobic soil metab | | | |
| B | 162-3 | Anaerobic aquatic me | | | |
| B | 162-4 | Aerobic aquatic meta | | | |
| B | 163-1 | Leach/adsorp/desorpt Y R 1 14 | | | |
| | 163-1 | Leach/adsorp/desorpt 41995007 | | Not Yet Reviewed | |
| | 163-1 | Leach/adsorp/desorpt 42212901 | | Not Yet Reviewed | |

Comments: AGED LEACHING STUDY.

| | | | | | |
|--|-------|-------------------------------|--|------------------|--|
| | 163-1 | Leach/adsorp/desorpt 42304701 | | Not Yet Reviewed | |
|--|-------|-------------------------------|--|------------------|--|

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

Comments: SUPPLEMENT TO MRID42212901.

| | | | | | |
|--|-------|----------------------|----------|--------------|--|
| | 163-1 | Leach/adsorp/desorpt | Time Ext | Fully Accept | |
|--|-------|----------------------|----------|--------------|--|

Comments: AS OUR LETTER OD DECEMBER 1990 STATED, A TIME EXTENSION IS GRANTED TO AUGUST 24, 1991.

| | | | | | |
|---|-------|------------------|---------|----------|--|
| D | 163-2 | Volatility - lab | CR 8 14 | Required | |
|---|-------|------------------|---------|----------|--|

Comments: SINCE THE VAPOR PRESSURE IS ONLY marginally ABOVE THE TRIGGER VALUE AND THE TOXICOLOGICAL CHARACTERISTICS OF TETRAMETRIN ARE NOT COMPLETELY ESTABLISHED, OUR POSITION REMAINS THAT THIS STUDY IS REQUIRED.

| | | | | | |
|--|-------|------------------|----------|--------|--|
| | 163-2 | Volatility - lab | Time Ext | Denied | |
|--|-------|------------------|----------|--------|--|

Comments: A TIME EXTENSION IS NOT APPLICABLE SINCE NO COMMITMENT CURRENTLY EXISTS.

| | | | | | |
|--|-------|------------------|--------|--------------|--|
| | 163-2 | Volatility - lab | Waiver | Fully Accept | |
|--|-------|------------------|--------|--------------|--|

Comments: DROPPED GREENHOUSE USE. SENT FOR REVIEW AGAIN 6/20/92. OUR NOVEMBER 1992 LETTER ACCEPTED THE WAIVER.

| | | | | | |
|---|-------|--------------------|----|----------|--|
| B | 163-3 | Volatility - field | CR | Required | |
|---|-------|--------------------|----|----------|--|

| | | | | | |
|--|-------|--------------------|------|--|--|
| | 163-3 | Volatility - field | Misc | | |
|--|-------|--------------------|------|--|--|

| | | | | | |
|---|-------|----------------------|----------|--|--|
| B | 164-1 | Terrestrial field di | Y R 1 14 | | |
|---|-------|----------------------|----------|--|--|

Comments: AS OUR LETTER OF DECEMBER 30, 1990 STATED, A TIME EXTENSION TO AUGUST 24, 1992 IS GRANTED.

24

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

| | | | | | |
|--|-------|----------------------|----------|-----------------|--|
| | 164-1 | Terrestrial field di | 42487301 | No Decision Yet | |
|--|-------|----------------------|----------|-----------------|--|

Comments: NOT SENT FOR REVIEW. INTERIM REPORT (10/5/92).

| | | | | | |
|--|-------|----------------------|----------|-----------------|--|
| | 164-1 | Terrestrial field di | 42487302 | No Decision Yet | |
|--|-------|----------------------|----------|-----------------|--|

Comments: NOT SENT FOR REVIEW. INTERIM REPORT (10/5/92).

| | | | | | |
|--|-------|----------------------|----------|------------------|--|
| | 164-1 | Terrestrial field di | 42622401 | Not Yet Reviewed | |
|--|-------|----------------------|----------|------------------|--|

| | | | | | |
|--|-------|----------------------|----------|------------------|--|
| | 164-1 | Terrestrial field di | 42622402 | Not Yet Reviewed | |
|--|-------|----------------------|----------|------------------|--|

| | | | | | |
|--|-------|----------------------|----------|--------------|--|
| | 164-1 | Terrestrial field di | Time Ext | Fully Accept | |
|--|-------|----------------------|----------|--------------|--|

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 164-2 | Aquatic field dissip | | | |
|---|-------|----------------------|--|--|--|

| | | | | | |
|---|-------|----------------------|---|--|--|
| B | 164-3 | Forest field dissipa | R | | |
|---|-------|----------------------|---|--|--|

| | | | | | |
|---|-------|----------------------|----|--|--|
| B | 164-5 | Long term soil dissi | cr | | |
|---|-------|----------------------|----|--|--|

Comments: THIS DATA REQUIREMENT IS RESERVED PENDING RESULTS OF THE FIELD DISSIPATION STUDY.

| | | | | | |
|---|-------|---------------------|--|--|--|
| B | 165-1 | Confined rotational | | | |
|---|-------|---------------------|--|--|--|

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 165-2 | Field rotational cro | | | |
|---|-------|----------------------|--|--|--|

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 165-3 | Accumulation - irrig | | | |
|---|-------|----------------------|--|--|--|

| | | | | | |
|---|-------|----------------------|----|--|--|
| D | 165-4 | Bioaccumulation in f | 14 | | |
|---|-------|----------------------|----|--|--|

Comments: THIS IS REQUIRED WHEN SIGNIFICANT CONCENTRATIONS OF THE ACTIVE INGREDIENT AND/OR ITS PRINCIPAL DEGRADATION PRODUCTS ARE LIKELY TO OCCUR IN AQUATIC ENVIRONMENTS AND MAY ACCUMULATE IN AQUATIC ORGANISMS.

25

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

| | | | | | |
|--|-------|-----------------------------|--|--------------|--|
| | 165-4 | Bioaccumulation in f Waiver | | Fully Accept | |
|--|-------|-----------------------------|--|--------------|--|

Comments: ON AUGUST 30, 1991 A WAIVER WAS REQUESTED AND SENT FOR REVIEW ON 9/6/91. OUR NOVEMBER 1992 LETTER GRANTED THE WAIVER.

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 165-5 | Bioaccum-aquatic non | | | |
|---|-------|----------------------|--|--|--|

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 166-1 | Grd water-small pros | | | |
|---|-------|----------------------|--|--|--|

Comments: SEE COMMENT FOR 164-5.

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 166-2 | Grd water-sm. retros | | | |
|---|-------|----------------------|--|--|--|

Comments: SEE COMMENT FOR 164-5.

| | | | | | |
|---|-------|----------------------|--|--|--|
| B | 166-3 | Grd water-irg retros | | | |
|---|-------|----------------------|--|--|--|

Comments: SEE COMMENT FOR 164-5.

GUIDELINE 167-1- SURFACE WATER FIELD RUNOFF AND
 GUIDELINE 167-2- SURFACE WATER MONITORING ARE ALSO
 RESERVED PENDING RESULTS OF FIELD DISSIPATION STUDY.

| | | | | | |
|---|-------|----------------------|----|----------|--|
| D | 201-1 | Droplet size spectru | 14 | Required | |
|---|-------|----------------------|----|----------|--|

| | | | | | |
|--|-------|-----------------------------|--|--------------|--|
| | 201-1 | Droplet size spectru Waiver | | Fully Accept | |
|--|-------|-----------------------------|--|--------------|--|

Comments: REGISTRANT HAS REQUESTED WAIVER ON 11/25/91. OUR NOVEMBER 1992 LETTER GRANTED THE WAIVER.

| | | | | | |
|---|-------|----------------------|----|----------|--|
| D | 202-1 | Drift field evaluati | 14 | Required | |
|---|-------|----------------------|----|----------|--|

Comments: GUIDELINE #231- ESTIMATION OF DERMAL EXPOSURE AT

26

U.S. Environmental Protection Agency
Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|--------|-------------|------------------------------|--------------|------|
|--------|--------|-------------|------------------------------|--------------|------|

GDLN Comments Continued:

OUTDOOR SITES
 GUIDELINE #232- ESTIMATION OF INHALATION EXPOSURE AT
 OUTDOOR SITES
 GUIDELINE #233- ESTIMATION OF DERMAL EXPOSURE AT
 INDOOR SITES
 GUIDELINE #234- ESTIMATION OF INHALATION EXPOSURE AT
 INDOOR SITES

BASED ON THE AVAILABLE TOXICITY DATA THESE STUDIES
 ARE RESERVED.

SPECIAL STUDIES REQUIRED:

SINCE THIS IS A PYRETHROID THE FOLLOWING SPECIAL
 STUDIES ARE REQUIRED:

81-8SS ACUTE NEUROTOXICITY SCREENING- RAT
 THIS BATTERY INCLUDES FUNCTIONAL OBSERVATION,
 MOTOR ACTIVITY AND NEUROPATHOLOGY.

82-7SS 90-DAY NEUROTOXICITY- MAMMALS
 THIS BATTERY INCLUDES FUNCTIONAL OBSERVATION,
 MOTOR ACTIVITY AND NEUROPATHOLOGY. A RADIOIMMUNOASSAY
 FOR GLIAL FIBRILLARY ACIDIC PROTEIN MUST BE INCLUDED
 AS WELL AS OBSERVATIONS, NEUROPATHOLOGY, ACETYL
 CHOLINESTERASE AND NEUROTOXIC ESTERASE.

202-1 Drift field evaluati Waiver Fully Accept

Comments: REGISTRANT REQUESTED WAIVER ON 11/25/91. OUR NOVEMBER
 1992 LETTER ACCEPTED THE WAIVER.

B 171-2 Chemical identity Y R 1

171-2 Chemical identity 41609615 Not Yet Reviewed

27

U.S. Environmental Protection Agency
 Phase 3 Data Dump
 11/23/93

| | |
|---------------------------------------|---|
| Chemical/Case Number 069003 / 2660 | Company Number / Name 010308 SUMITOMO CHEMICAL COMPANY, LTD. |
|---------------------------------------|---|

| STATUS | GDLN # | DESCRIPTION | REGISTRANT'S COMPLIANCE/MRID | EPA DECISION | DATE |
|--------|----------|----------------------|------------------------------|--------------|------|
| B | 171-3 | Directions for use | Y R | | |
| B | 171-5 | Reduction of residue | | | |
| B | 171-4(a) | Nature of residue - | CR | | |
| B | 171-4(b) | Nature of residue - | | | |
| B | 171-4(c) | Res. analyt. method | CR | | |
| B | 171-4(d) | Res. analyt. method | | | |
| B | 171-4(e) | Storage stability | CR | | |
| B | 171-4(f) | Mag. of res. potable | | | |
| B | 171-4(g) | Mag. of res. in fish | | | |
| B | 171-4(h) | Mag. of res. irrigat | | | |
| B | 171-4(i) | Mag. of res. food ha | | | |
| B | 171-4(j) | Mag. meat/milk/poult | | | |
| B | 171-4(k) | Cropfield trials | CR | | |
| B | 171-4(l) | Processed food | | | |
| B | 171-6 | Proposed tolerance | | | |
| B | 171-7 | Support for toleranc | | | |
| B | 171-13 | Anal. Reference Stnd | | | |

28