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

FEB 14 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Permethrin; Id. #109701. Joint ICI/FMC 10/21/88 135-day partial response to 5/31/88 DCI - Dissociation Constant (§63-10) Data Waiver request. No MRID No. Branch No. 4842.

FROM: Kenneth W. Dockter, Chemist
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THRU: A.R. Rathman, Section Head
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TO: Geraldine W. Werdig/Barbara L. Briscoe, PM 50
Generic Chemical Support Branch
Special Review/Reregistration Division (TS-767C)

By joint transmittal letter dated 10/21/88, ICI Americas Inc. and FMC Corporation, registrants of products containing permethrin as AI, argue that the Dissociation Constant (§63-10) required by the Data Call-In (DCI) issued 5/31/88 is not applicable.

The Companies state that since permethrin is a neutral, stable organic ester this data requirement is inappropriate. We agree.

The Branch has no objection to waiving the dissociation constant requirement, as jointly requested by ICI/FMC.

cc: K. Dockter (DEB), R. Schmitt, Permethrin S.F., E. Eldredge
(ISB/PMSD), Circulation (7), RF.
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