MEMORANDUM


FROM: Kenneth W. Dockter, Chemist
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Dietary Exposure Branch
Health Effects Division (TS-769C)

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.
RDI: ARRathman:2/14/89:EZager:2/14/89