MEMORANDUM:

           [MRID: #412519-01]
           [DEB: #5909]

FROM: William L. Anthony
       Special Registration Section II
       Dietary Exposure Branch
       Health Effects Division [H7509C]

THRU: Francis B. Suhre, Sec. Head
       Special Registration section II
       Dietary Exposure Branch
       Health Effects Division [H7509C]

TO: Linda DeLuis, PM #50
    Generic Chemical Support Branch
    Registration Division [H7505C]

The FMC Corporation, Agricultural Chemical Group, Princeton, NJ
has responded to Data Call-In Notice [10/21/88] by providing
Storage Stability [§63-17] and Corrosion Characteristics [§63.20] data
for technical permethylr [FMC 33297],[3-phenoxybenzyl(4RS,3RS:1RS,3SR)-
3-(2,2-dichloro-vinyl)-2,2-dimethylcyclo-propane-1-carboxylate],[40CFR
180.378].

Series 63: PHYSICAL AND CHEMICAL CHARACTERISTICS

§63-17 Storage Stability

Registrant: Technical permethylr stored in mini-drums at room
temperature (25°C) and at 50°C showed no significant degradation
following storage up to one year.

Permethylr was quantified by Calculations were based on the
response factor for each isomer. The ratio of the cis- and trans-
isomers of permethylr was used as an indicator of product purity.
Representative chromatograms of the internal standard and the cis-
and trans- isomers of permethylr were provided.

DEB Comment: The requirement to determine the storage stability of
permethylr has been satisfied.
§ 63-20 Corrosion Characteristics

Registrant: The corrosion characteristics were determined in combination with the storage stability studies as described under [§63-17]. The physical appearance of the permethrin samples remained unchanged, i.e., no loss of homogeneity nor discoloration was observed. Finally, a visual examination of the coated mini-drum surfaces, did not reveal any indication of corrosion such as pitting, swelling, loss of sheen, or etching.

DEB Comment: As with the storage stability studies, the corrosion characteristic requirements have been satisfied.

Conclusion and Recommendation

The product chemistry data requirements for determining the storage stability and corrosion characteristics of technical permethrin have been satisfied.

CC: Reviewer; RF; SF[Permethrin]; PMSD/ISB; Circulation; R. Schmitt.
RDI: FBS, 12/15/89; EZ, 12/18/89.
H7509C: W. Anthony; wla; CM#2; Rm. 812; X557-4351; 12/18/89.