To: T. Gardner

Product Manager 17

Registration Division (TS-767)

From: Joe Reinert _Related for_
Chief, Environmental Chemistry Review Section #2
Exposure Assessment Branch, HED (TS-767)

Attached, please find the environmental fate review of:

Reg./File No.: 279-GNET/ 279-GNET (2 actions)

Chemical: Cypermethrin

Type Product: Insecticide

Product Name: Ammo 2.5 EC Insecticide

Company Name: FMC Corporation

Submission Purposes: Label Modification

ZBB Code: 3 (C) (7) and other   Action Code: _____

	TAIS (Level II)	Days
Date In: 4 May 1984	63	0.5

EFB#: 4355, 4356

Deferals To:

_____   Ecological Effects Branch

_____   Residue Chemistry Branch

_____   Toxicology Branch

I. INTRODUCTION

FMC Corporation. representative, Mark W. Galley, in
a letter dated 1 May 1984 to Adam Heyward responded
to an unfavorable Toxicology Branch Risk Assessment
(27 March 1984) for Ammo 2.5 EC Insecticide by submitting
a modified label which includes mandatory protective clothing
for the mixer/loader. In this letter he further requests
that we use a spray drift study to develop an exposure
assessment for the ULV oil formulations of cypermethrin
Additionally, in a second letter to Mr. Heyward (also on
1 May 1984) he agrees to do a dermal penetration study as
part of the conditions for registration.

II. CONCLUSIONS

The mixer/loader exposures have been lowered to 10% of
what they were in my March 2, 1984 memorandum to John
Doherty. These reduced estimates had been forwarded
months ago to Tox. Branch (Hitch, 17 May 1984 memorandum
to Ed Budd). The fact that EAB/HED can not estimate
applicator exposure from a spray drift study was noted
at that time. . Tox. Branch does not need to be notified
that a dermal penetration study is underway (pers. comm.
Ed. Budd). The current action merely logs out the
registration papers thru proper channels.

Robert K. Hitch
Exposure Assessment Branch
HED/OPTS