MEMORANDUM


TO: David Severn, Chief Exposure Assessment Branch Hazard Evaluation Division (TS-769C)

and

Toxicology Branch File

FROM: Karen L. Hamernik, Ph.D. Section VII, Toxicology Branch Hazard Evaluation Division (TS-769C)

THRU: Edwin R. Budd, Acting Section Head Section VII, Toxicology Branch Hazard Evaluation Division (TS-769C)

ICI Americas Inc., Wilmington, DE, has proposed the use of cypermethrin-containing Cymbush 3E Insecticide on pecans. In order for Toxicology Branch (TB) to assess the potential oncogenic risk associated with the use of cypermethrin as proposed, information on applicator exposure to the pesticide is required. TB is therefore requesting the Exposure Assessment Branch to perform an exposure assessment for workers who will use Cymbush 3E Insecticide as shown on the product label (attached) and to provide TB with the results of the assessment upon its completion.
The material not included contains the following type of information:

_____ Identity of product inert ingredients.
_____ Identity of product impurities.
_____ Description of the product manufacturing process.
_____ Description of quality control procedures.
_____ Identity of the source of product ingredients.
_____ Sales or other commercial/financial information.

X A draft product label.

_____ The product confidential statement of formula.
_____ Information about a pending registration action.
_____ FIFRA registration data.
_____ The document is a duplicate of page(s) ________.
_____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
Mr. Timothy A. Gardner  
Product Manager (17)  
Registration Division (TS-767C)  
U.S. Environmental Protection Agency  
1921 Jefferson Davis Highway  
Crystal Mall 2, Room 207  
Arlington, VA  22202  

Dear Mr. Gardner:  

Re: CYMBUSH® 3E Insecticide  
Pesticide Petition No. 4F2986  
Your Letter of May 1, 1984  

Enclosed is a revised Section B which incorporates changes to resolve each of the deficiencies listed in your letter as follows:  

1. The livestock grazing restriction has been revised to read: "Do not graze livestock on treated ground or cut treated cover crops for feed".  

2a. A measurable range (2.56 - 4.27 fl. oz.) for the formulation is included in parenthesis behind the range of a.i. found in the dosage statement.  

2b. The misleading portion of the label concerning the correct gallons of water needed to spray one acre of trees to the point of drip, has been clarified as specified in the Agency's letter.  

Based on the enclosed information resolving the residue questions and the completion of the toxicology review, we believe that a registration decision can now be made for the use of cypermethrin on pecans. We do request your assistance in obtaining expedited approvals from the Residue Chemistry and Toxicology Branches since this would allow use of cypermethrin on pecans during this season.  

Sincerely,  

Barbara J. Kaminski  
Pesticide Regulatory Specialist  

BJK/bmw  

Enclosure  

Wilmington, Delaware 19897 Phone (302) 575-3000