MEMORANDUM

SUBJECT: EPA Reg. No./File Symbol 10182 - RUN

Cypermethrin 70% Technical

FROM: Olga Odiott
Precautionary Review Section
Registration Support Branch
Registration Division (B75-05C)

TO: George I. Lasco (PM 15)
Insecticide - Rodenticide Branch
Registration Division (B75-05C)

APPLICANT: ICI Americas
Agricultural Products Division
Greene Pike & Ken Murphy Rd.
Wilmington, DE 19840

FORMULATION FROM LABEL:

Active Ingredient(s):

- Cypermethrin (3,5-di(2,4-dichlorophenoxy)phenyl)carboxylic acid analogs

Inert Ingredient(s): ...........................................

% by wt.  70%

Total 100.0%

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BACKGROUND

ICI Americas Inc. submitted an acute inhalation study on Reg. No. 10182-RUN to fulfill the acute toxicity data requirements for registration. The study was conducted at ICI Central Toxicology Lab, Cheshire, UK. MRID No. 413036-01.

The product was characterized as follows in a previous review: acute oral- Cat II; acute dermal- Cat III; acute eye- Cat III; skin irritation- Cat IV; skin sensitization- a sensitizer.

RECOMMENDATION

RSB/PRS finds the study supplementary data. The MMAD's are greater than 1.0 μm. The Agency requires at least 25% of the particles to meet the size requirement. A Memo by Dr. Stanley Gross on acute inhalation toxicity testing is included for registrant's reference.

LABELING

Statements of practical treatment:

The last sentence of the "If in eyes" statement should read:
"Call a physician if irritation persists."

Precautionary statements:

Delete: "...goggles, or full face shield." Use of goggles is not required for this product's formulation.

Add: "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

Further label revisions may be necessary upon submittance of outstanding data.

Note to PM:

In a precautionary labeling review dated 3-8-88, the dermal sensitization study with MRID No. 403777-01 was classified as a moderate sensitizer. The letter sent to the registrant on May 23, 1988 indicated the product was a non-sensitizer and precautionary labeling regarding sensitization was not necessary.
DATA REVIEW FOR ACUTE INHALATION TOXICITY TESTING (§81-3)

Product Manager: (15) Reviewer: O. Odiott
MRID No.: 13803-01 Report Date: 24 Apr. 1994
Testing Laboratory: CET Central Toxicology Lab Report No. HRO 867
Author(s): R. Beamer
Species: Rattus norvegicus, adult, male and female
Sex: 15 males, 15 females
Weight: 201 - 240 g
Source: Alderley Park, Cheshire, UK
Test Material: Cypermethrin (technical) 2.9% Al.
Quality Assurance (40 CFR §160.12): Attached

Summary:

1. LC50 (mg/kg): Males = _______; Females = _______; Combined = _______
2. The estimated LC50 is _______.
3. Mean Concentration: _______.
4. Tox. Category: _______. Classification: _______.

Procedure (Deviations From §81-2): NHAD greater than 1.0.
*Animals were killed due to severe clinical effects on days 1 and 2 following exposure.

Results:

<table>
<thead>
<tr>
<th>Exposure Concentration (mg/L)</th>
<th>Number Killed/Number Tested</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Males</td>
</tr>
<tr>
<td>0.53 mg/L</td>
<td>0/5</td>
</tr>
<tr>
<td>1.05 mg/L</td>
<td>4/5</td>
</tr>
<tr>
<td>1.98 mg/L</td>
<td>5/5</td>
</tr>
</tbody>
</table>

NHAD = 3.95 µg, 4.68 µg
and 5.20 µg, respectively

Symptomology & Gross Necropsy Findings:

Dizziness, sedation, reduced breathing rate, increased breathing depth, reduced response to sound, intermittent tail elevation, functoid fasciculation, ataxia - dacrystane, shaking and reduced ataxia. No abnor-
malities reported for gross necropsy examinations.
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.
☐ 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.