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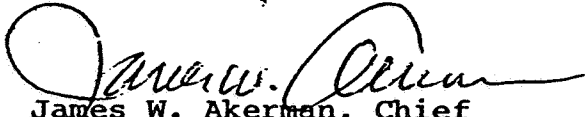
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

OCT 2 1988

MEMORANDUM

Subject: FMC 6(a)(2) Letter for Bifenthrin


From: James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Branch

To: George LaRocca (PM-15)
Registration Division

EEB can make no substantive comment on the reductions of aquatic invertebrates observed in the conduct of the bifenthrin pond study. FMC is performing follow-up monitoring in 1988, the second year following treatment of the site. As with the reported gizzard shad mortalities, EEB can only speculate as to the acceptability of these adverse effects in relation to bifenthrin use on cotton. EEB's presumption that bifenthrin poses a serious threat to aquatic organisms seems to be upheld by these tentative findings.