

United States Environmental Protection
Agency Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0107
OMB Approval 2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
279-3013 279-3188 279-3336				N.A. N.A. N.A.	N.A. N.A. N.A.

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative _____	9. Date
10. Name of Company	11. Phone Number

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address BAYER ENVIRONMENTAL SCIENCE 2 T. W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
432-1064				N.A.	N.A.
432-1076				N.A.	N.A.
432-1141				N.A.	N.A.
432-1150				N.A.	N.A.
432-1461				N.A.	N.A.
432-551				N.A.	N.A.
432-552				N.A.	N.A.
432-803				N.A.	N.A.
432-877				N.A.	N.A.

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10. Name of Company Signature and Title of Company's Authorized Representative _____	11. Phone Number
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1. Company Name and Address MCLAUGHLIN GORMLEY KING CO 8810 TENTH AVE NORTH MINNEAPOLIS, MN 554274319	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
1021-1441				N.A.	N.A.
1021-1542				N.A.	N.A.
1021-1545				N.A.	N.A.
1021-1548				N.A.	N.A.
1021-1550				N.A.	N.A.
1021-1556				N.A.	N.A.
1021-1653				N.A.	N.A.
1021-1659				N.A.	N.A.
1021-1669				N.A.	N.A.
1021-1677				N.A.	N.A.
1021-1695				N.A.	N.A.
1021-1737				N.A.	N.A.
1021-1789				N.A.	N.A.
1021-1791				N.A.	N.A.
1021-1848				N.A.	N.A.

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address AMVAC CHEMICAL CORPORATION 4695 MACARTHUR COURT, SUITE 1250 NEWPORT BEACH, CA 926601706		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467		
4. EPA Product Registration 5481-548	5. I wish to cancel this product registration voluntarily	6. Generic Data 6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.		6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7. Product Specific Data 7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response." N.A.	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response." N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.						
9. Date					9. Date	
10. Name of Company					10. Name of Company	
Signature and Title of Company's Authorized Representative					Signature and Title of Company's Authorized Representative	
11. Phone Number					11. Phone Number	

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1. Company Name and Address CLARKE MOSQUITO CONTROL PRODUCTS, INC. 110 EAST IRVING PARK ROAD, 4TH FLOOR ROSELLE, IL 60172	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
8329-86				N.A.	N.A.

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative _____

9. Date

10. Name of Company

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address GHARDA CHEMICALS LTD 4032 CROCKERS LAKE BLVD., STE 818 SARASOTA, FL 34238	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. EPA Product Registration 33658-20	5. I wish to cancel this product registration voluntarily	6. Generic Data 6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.		6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7. Product Specific Data 7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
					N.A.	N.A.

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative _____	9. Date 11. Phone Number
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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address CONTROL SOLUTIONS, INC. 5903 GENOA-RED BLUFF ROAD PASADENA, TX 775071041	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
53883-31		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
				N.A.	N.A.

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative _____	9. Date _____ 10. Name of Company _____ 11. Phone Number _____
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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address UNITED PHOSPHORUS, INC 630 FREEDOM BUSINESS CENTER, SUITE 402 KING OF PRUSSIA, PA 19406		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467	
4. EPA Product Registration 70506-4 70506-5	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
				N.A. N.A.	N.A. N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.			9. Date		
Signature and Title of Company's Authorized Representative _____			11. Phone Number		
10. Name of Company					

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address MEGHMANI ORGANICS LIMITED 16160 NALL AVENUE STILWELL, KS 66085		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
70553-1				N.A.	N.A.
70553-2				N.A.	N.A.
70553-3				N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date	
Signature and Title of Company's Authorized Representative					
10. Name of Company				11. Phone Number	

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address LG LIFE SCIENCES, LTD. 12208 QUINQUE LANE CLIFTON, VA 20124		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data			
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7. Product Specific Data	
71532-1				N.A.	N.A.
71532-7				N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date	
Signature and Title of Company's Authorized Representative					
10. Name of Company				11. Phone Number	

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY, SUITE 100 LIBERTYVILLE, IL 600486316	2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
73049-124				N.A.	N.A.
73049-152				N.A.	N.A.
73049-158				N.A.	N.A.
73049-166				N.A.	N.A.
73049-277				N.A.	N.A.
73049-278				N.A.	N.A.
73049-310				N.A.	N.A.
73049-312				N.A.	N.A.
73049-315				N.A.	N.A.
73049-316				N.A.	N.A.
73049-325				N.A.	N.A.
73049-330				N.A.	N.A.
73049-342				N.A.	N.A.
73049-352				N.A.	N.A.
73049-353				N.A.	N.A.
73049-379				N.A.	N.A.
73049-393				N.A.	N.A.

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1. Company Name and Address VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY, SUITE 100 LIBERTYVILLE, IL 600486316		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467	
4. EPA Product Registration 73049-410 73049-411 73049-412 73049-418 73049-434	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
				N.A. N.A. N.A. N.A. N.A.	N.A. N.A. N.A. N.A. N.A.
Initial to indicate certification as to information on this page (full text of certification is on page one).					Date

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST., RM 1978 PHILADELPHIA, PA 19103	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	3. Date and Type of DCl and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O C E D U R E	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCI and Number	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
875.1200	Applicator Exposure Data Requirements (Conventional Chemical) Dermal exposure--indoor	2510 Permethrin		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor	Chemical # and Name Permethrin		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1380	Residue Chemistry Data Requirements for Food Uses (Conventional Chemical) Storage stability data	109701		H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concern	24	
860.1500	Crop field trials(CABBAGE)			H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)	(4, 15)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)	(20)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)	(3)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)	(17)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)	(24)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)	(25)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

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1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page
(full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGA1 = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGA1 = Technical Grade Active Ingredient [TGA1]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
| B - Terrestrial feed crop | I - Greenhouse nonfood crop | O - Residential indoor use | EE - Indoor use |
| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1X.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern; TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

A - Terrestrial food crop	H - Greenhouse food crop	K - Residential	U - Residential and public access p
B - Terrestrial feed crop	I - Greenhouse nonfood crop	O - Residential Indoor use	EE - Indoor use
C - Terrestrial nonfood crop	J - Forestry use	Q - Residential outdoor use	

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address BAYER ENVIRONMENTAL SCIENCE 21. W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		1	2	3				
875.1200	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u> Dermal exposure--indoor				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1380	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u> Storage stability data				H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concern	24	
860.1500	Crop field trials(CABBAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

11. Date

Signature and Title of Company's Authorized Representative

12. Name of Company

13. Phone Number

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address BAYER ENVIRONMENTAL SCIENCE 2 T. W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC 27709	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCL and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title		P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)	(18)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)	(16, .21, .22)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity	(2)				H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study	(28, .29, .30)				H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing	(26)				H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing	(27)				H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one). Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concn = Typical End-Use Product or Residue of Concn;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
| B - Terrestrial feed crop | I - Greenhouse nonfood crop | O - Residential indoor use | EE - Indoor use |
| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
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- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1x.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEPI]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
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Use Categories Key:

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|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
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| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCI and Number	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
875.1200	Applicator Exposure Data Requirements (Conventional Chemical) Dermal exposure--Indoor	MCLAUGHLIN GORMLEY KING CO 8810 TENTH AVE NORTH MINNEAPOLIS, MN 554274319	2510 Permethrin Chemical # and Name Permethrin	28-May-2009 GENERIC ID # GDCL-109701-26467	24	
875.1400	Inhalation exposure--Indoor			H, U, EE, I, K, Q, A, B, C, J, O H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1380	Residue Chemistry Data Requirements for Food Uses (Conventional Chemical) Storage stability data			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(CABBAGE)			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(COLLARDS)			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(GRASS, FORAGE)			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(LETTUCE, LEAF)			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(PEACH)			H, U, EE, I, K, Q, A, B, C, J, O	8	
860.1500	Crop field trials(PEAR)			H, U, EE, I, K, Q, A, B, C, J, O	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)			H, U, EE, I, K, Q, A, B, C, J, O	24	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative _____
11. Date _____
12. Name of Company _____
13. Phone Number _____

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address MCLAUGHLIN GORMLEY KING CO 8810 TENTH AVE NORTH MINNEAPOLIS, MN 554274319	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCl and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. Guideline Requirement Number	5. Study Title	18	21	22	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
860.1500	Crop field trials(SOYBEAN, SEED)	(18)			H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)	(16, 21, 22)			H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>							
870.1300	Acute inhalation toxicity	(2)			H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study	(28, 29, 30)			H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing	(26)			H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing	(27)			H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGA1 = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concn = Typical End-Use Product or Residue of Concern;
TGA1 = Technical Grade Active Ingredient [TGA1]

Use Categories Key:

- A - Terrestrial food crop H - Greenhouse food crop K - Residential U - Residential and public access p
- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential Indoor use EE - Indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at tx.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrant's amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAJ = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product; TEP1, TEP or res of concn = Typical End-Use Product or Residue of Concern; TGAJ = Technical Grade Active Ingredient [TGAJ]

Use Categories Key:

A - Terrestrial food crop	H - Greenhouse food crop	K - Residential	U - Residential and public access p
B - Terrestrial feed crop	I - Greenhouse nonfood crop	O - Residential Indoor use	EE - Indoor use
C - Terrestrial nonfood crop	J - Forestry use	Q - Residential outdoor use	

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCI and Number	P R O G R E S S R E P O R T C O L L			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
				1	2	3				
875.1200	Applicator Exposure Data Requirements (Conventional Chemical) Dermal exposure--Indoor	2510 Permethrin Chemical # and Name Permethrin	28-May-2009 GENERIC ID # GDCL-109701-26467				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1380	Residue Chemistry Data Requirements for Food Uses (Conventional Chemical) Storage stability data						H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concn	24	
860.1500	Crop field trials(CABBAGE)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)						H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address AMVAC CHEMICAL CORPORATION 4695 MACARTHUR COURT, SUITE 1250 NEWPORT BEACH, CA 926601706	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

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- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential indoor use EE - Indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1X.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
| B - Terrestrial feed crop | I - Greenhouse nonfood crop | O - Residential indoor use | EE - Indoor use |
| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address CLARKE MOSQUITO CONTROL PRODUCTS, INC. 110 EAST IRVING PARK ROAD, 4TH FLOOR ROSELLE, IL 60172		2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin		109701		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467		
4. Guideline Requirement Number	5. Study Title	6. Use Pattern	P R O T O C O L			7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			Progress Reports	1	2			
875.1200	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u> Dermal exposure--Indoor	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
875.1400	Inhalation exposure--Indoor	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1380	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u> Storage stability data	H, U, EE, I, K, Q, A, B, C, J, O				TEP or res of concern	24	
860.1500	Crop field trials(CABBAGE)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1500	Crop field trials(COLLARDS)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1500	Crop field trials(PEACH)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	8	
860.1500	Crop field trials(PEAR)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)	H, U, EE, I, K, Q, A, B, C, J, O				TEP	24	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative _____

11. Date _____

12. Name of Company _____

13. Phone Number _____

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address CLARKE MOSQUITO CONTROL PRODUCTS, INC. 110 EAST IRVING PARK ROAD, 4TH FLOOR ROSELLE, IL 60172	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCI-109701-26467
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4. Guideline Requirement Number	5. Study Title	18	21	22	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
860.1500	Crop field trials(SOYBEAN, SEED)	(18)			H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)	(16, 21, 22)			H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>							
870.1300	Acute inhalation toxicity	(2)			H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study	(28, 29, 30)			H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing	(26)			H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing	(27)			H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCI-109701-26467

Key: MP & TGA1 = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGA1 = Technical Grade Active Ingredient [TGA1]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
| B - Terrestrial feed crop | I - Greenhouse nonfood crop | O - Residential indoor use | EE - Indoor use |
| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
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- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at tx.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCl-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concn = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
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Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
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- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
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Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address GHARDA CHEMICALS LTD 4032 CROCKERS LAKE BLVD., STE 818 SARASOTA, FL 34238		2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin		109701		3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467	
4. Guideline Requirement Number	5. Study Title	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	P R O T O C O L	
						Progress Reports	1 2 3
875. 1200	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u> Dermal exposure--indoor	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
875. 1400	Inhalation exposure--indoor	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u>							
860. 1380	Storage stability data	H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concern	24			
860. 1500	Crop field trials(CABBAGE)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
860. 1500	Crop field trials(COLLARDS)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
860. 1500	Crop field trials(GRASS, FORAGE)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
860. 1500	Crop field trials(LETTUCE, LEAF)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
860. 1500	Crop field trials(PEACH)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	8			
860. 1500	Crop field trials(PEAR)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			
860. 1500	Crop field trials(SOYBEAN, FORAGE)	H, U, EE, I, K, Q, A, B, C, J, O	TEP	24			

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

11. Date

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13. Phone Number

United States Environmental Protection
Agency Washington, D.C. 20460

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
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Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern; TGAI = Technical Grade Active Ingredient [TGAI]

- Use Categories Key:
- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
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| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

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- 9 Confirmatory data are required from t test conducted in Region 6 depicting residues of permethrin in/on collards harvested t day following the last of eight foliar applications of permethrin at 1x.
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- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.0t lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (t6 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concn = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
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Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

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Agency Washington, D.C. 20460

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address CONTROL SOLUTIONS, INC. 5903 GENOA-RED BLUFF ROAD PASADENA, TX 775071041	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			t	2	3				
	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u>								
875.1200	Dermal exposure--indoor					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u>								
860.1380	Storage stability data					H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concn	24	
860.1500	Crop field trials(CABBAGE)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

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Signature and Title of Company's Authorized Representative _____ 11. Date _____

12. Name of Company _____ 13. Phone Number _____

United States Environmental Protection
Agency Washington, D.C. 20460

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address CONTROL SOLUTIONS, INC. 5903 GENOA-RED BLUFF ROAD PASADENA, TX 775071041	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCl and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O C E D U R E	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)	(18)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity	(2)				H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study	(28 ,29 ,30)				H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing	(26)				H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing	(27)				H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCL109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- A - Terrestrial food crop H - Greenhouse food crop K - Residential
- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use
- U - Residential and public access p
- EE - Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1x.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrant's amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern; TGAI = Technical Grade Active Ingredient [TGAI]

- Use Categories Key:
- A - Terrestrial food crop H - Greenhouse food crop K - Residential U - Residential and public access p
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 - C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrant's amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address UNITED PHOSPHORUS, INC 630 FREEDOM BUSINESS CENTER, SUITE 402 KING OF PRUSSIA, PA 19406	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCl and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		1	2	3				
875.1200	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u> Dermal exposure--Indoor				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u>							
860.1380	Storage stability data				H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concern	24	
860.1500	Crop field trials(CABBAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative _____

11. Date _____

12. Name of Company _____

13. Phone Number _____

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address UNITED PHOSPHORUS, INC 630 FREEDOM BUSINESS CENTER, SUITE 402 KING OF PRUSSIA, PA 19406	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCl and Number 28-May-2009 GENERIC ID # GDCl-109701-26467
--	--	--------	--

4. Guideline Requirement Number	5. Study Title	P R O O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.1300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concn = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- A - Terrestrial food crop H - Greenhouse food crop K - Residential U - Residential and public access p
- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential indoor use EE - Indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1X.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrant's amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCL-109701-26467

Key: MP & TGI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGI = Technical Grade Active Ingredient [TGI]

Use Categories Key:

- | | | | |
|------------------------------|-----------------------------|-----------------------------|-------------------------------------|
| A - Terrestrial food crop | H - Greenhouse food crop | K - Residential | U - Residential and public access p |
| B - Terrestrial feed crop | I - Greenhouse nonfood crop | O - Residential Indoor use | EE - Indoor use |
| C - Terrestrial nonfood crop | J - Forestry use | Q - Residential outdoor use | |

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
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Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCI and Number	P R O G R E S S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
				Reports	1	2				
1. Company Name and Address MEGHMANI ORGANICS LIMITED 16160 NALL AVENUE STILWELL, KS 66085		2510 Permethrin Chemical # and Name Permethrin		109701			28-May-2009 GENERIC ID # GDCl-109701-26467			
875.1200	<u>Applicator Exposure Data Requirements (Conventional Chemical)</u> Dermal exposure--indoor	(6, 7, 8, 23)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
875.1400	Inhalation exposure--indoor	(9, 10, 11, 19)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1380	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u> Storage stability data	(1, 12, 13)				H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concern	24		
860.1500	Crop field trials(CABBAGE)	(5, 14)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1500	Crop field trials(COLLARDS)	(4, 15)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1500	Crop field trials(GRASS, FORAGE)	(20)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1500	Crop field trials(LETTUCE, LEAF)	(3)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1500	Crop field trials(PEACH)	(17)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	8		
860.1500	Crop field trials(PEAR)	(24)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		
860.1500	Crop field trials(SOYBEAN, FORAGE)	(25)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24		

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

11. Date

Signature and Title of Company's Authorized Representative

12. Name of Company

13. Phone Number

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address MEGHMANI ORGANICS LIMITED 16160 NALL AVENUE STILWELL, KS 66085	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
860. t500	Crop field trials(SOYBEAN, SEED)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860. t500	Crop field trials(TOMATO)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870. t300	Acute inhalation toxicity					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850. t000	Chronic Freshwater Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850. 1000	Chronic Estuarine/Marine Sediment Testing					H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page
(full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

Key: MP & TGI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP], TEP or res of concn = Typical End-Use Product or Residue of Concern;
TGI = Technical Grade Active Ingredient [TGI]

Use Categories Key:

- A - Terrestrial food crop H - Greenhouse food crop K - Residential
- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use
- U - Residential and public access p
- EE - Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

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- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; t day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from t test conducted in Region 6 depicting residues of permethrin in/on collards harvested t day following the last of eight foliar applications of permethrin at 1x.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrant amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (t field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCh-109701-26467

Key: MP & TGI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product [TEP]; TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGI = Technical Grade Active Ingredient [TGI]

Use Categories Key:

A - Terrestrial food crop	H - Greenhouse food crop	K - Residential	U - Residential and public access p
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Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- t5 Submit data on storage intervals to update existing tomato study.
- 16 The Agency does not need a new field crop trial study for pears. Instead, information on sample storage intervals and conditions is required to upgrade the existing pear study.
- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- t9 The use of a combined study that utilizes the two-generation reproduction study in rodents (370.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

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OMB Approval 2070-0107
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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCl and Number	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	P R O G R E S S R E P O R T S		
							1	2	3
875.1200	Applicator Exposure Data Requirements (Conventional Chemical) Dermal exposure--Indoor	2510 Permethrin	28-May-2009	TEP	24				
875.1400	Inhalation exposure--Indoor	Chemical # and Name Permethrin	GENERIC ID # GDCl-109701-26467	TEP	24				
	<u>Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)</u> Storage stability data	109701							
860.1380				H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(CABBAGE)			H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(COLLARDS)	(4, 15)		H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(GRASS, FORAGE)	(20)		H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(LETTUCE, LEAF)	(3)		H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(PEACH)	(17)		H, U, EE, I, K, Q, A, B, C, J, O	8				
860.1500	Crop field trials(PEAR)	(24)		H, U, EE, I, K, Q, A, B, C, J, O	24				
860.1500	Crop field trials(SOYBEAN, FORAGE)	(25)		H, U, EE, I, K, Q, A, B, C, J, O	24				
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law							11. Date		
Signature and Title of Company's Authorized Representative _____							13. Phone Number		

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address LG LIFE SCIENCES, LTD. 12208 QUINQUE LANE CLIFTON, VA 20124	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	18	22	P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
				1	2	3				
860.1500	Crop field trials(SOYBEAN, SEED)	(18)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)	(16, 21, 22)					H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>									
870.1300	Acute inhalation toxicity	(2)					H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study	(28, 29, 30)					H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing	(26)					H, U, EE, I, K, Q, A, B, C, J, O		12	
SS850.1000	Chronic Estuarine/Marine Sediment Testing	(27)					H, U, EE, I, K, Q, A, B, C, J, O		12	

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin

DCI Number: GDCL-109701-26467

Key: MP & TGAI = Manufacturing-Use Product and Technical Grade Active Ingredient; TEP = Typical End Use Product; TEPi: TEP or res of concern = Typical End-Use Product or Residue of Concern;
TGAI = Technical Grade Active Ingredient [TGAI]

Use Categories Key:

- A - Terrestrial food crop H - Greenhouse food crop K - Residential U - Residential and public access p
- B - Terrestrial feed crop I - Greenhouse nonfood crop O - Residential indoor use EE - Indoor use
- C - Terrestrial nonfood crop J - Forestry use Q - Residential outdoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 Required if the product consists of, or under conditions of use will result in, a respirable material (e.g., gas, vapor, aerosol, or particulate).
- 2 Required for residential outdoor use on food crops if home gardens are to be treated or the home garden use is different from the agricultural use pattern on which the tolerance is established.
- 3 Protocols must be submitted for approval prior to the initiation of the study. Details for developing protocols are available from the Agency.
- 4 Data are required for occupational sites if the product is applied indoors.
- 5 Data are required for residential use sites if the product is applied indoors.
- 6 Both acute and chronic endpoints should be determined based on the data generated in the study.
- 7 Data depicting the stability of permethrin in frozen mushrooms (up to 10 months) and representative animal commodities are required to upgrade the animal feeding studies and mushroom studies.
- 8 Magnitude of residues in cabbage are needed that reflect currently specified use patterns (0.2 lb ai/A/app.; 1 day PHI). Residue decline data are not required, and samples only need to be analyzed for residues of permethrin.
- 9 Confirmatory data are required from 1 test conducted in Region 6 depicting residues of permethrin in/on collards harvested 1 day following the last of eight foliar applications of permethrin at 1x.
- 10 The Agency is not requiring a new field crop trial. A description of the residue analytical methodology used in the analysis of the peach samples is missing and is required to ensure the appropriate analytical method was used, and to upgrade the existing peach field trials.
- 11 The Agency does not have residue data supporting ULV applications to soybeans. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 12 This data requirement is specifically for the hand-held ULV fogger application type only.
- 13 Data are required depicting residues of permethrin in/on grass forage harvested immediately (0-day PHI) following application of permethrin at 0.01 lb ai/A to rangeland.
- 14 Magnitude of residues of permethrin are needed on tomato (16 field trials) reflecting current use pattern (0.2 lb ai/A; 4 apps.; 0-day PHI). At least 3 of the requested field trials should be conducted on cherry-type tomatoes.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 Permethrin
DCI Number: GDCl-109701-26467

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- I - Greenhouse nonfood crop
- J - Forestry use
- K - Residential
- L - Residential indoor use
- M - Residential outdoor use
- N - Residential and public access p
- O - Residential indoor use
- P - Residential outdoor use
- Q - Residential outdoor use
- R - Residential indoor use
- S - Residential outdoor use
- T - Residential indoor use
- U - Residential and public access p
- V - Residential indoor use
- W - Residential outdoor use
- X - Residential indoor use
- Y - Residential outdoor use
- Z - Residential indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 15 Submit data on storage intervals to update existing tomato study.
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- 17 The Agency does not have residue data supporting ULV applications to soybean. Alternatively, additional data is not needed if the registrants amend use directions for soybeans to specify a minimum volume of 2 gal/A for aerial applications.
- 18 Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 19 The use of a combined study that utilizes the two-generation reproduction study in rodents (870.3800) as a basic protocol for the addition of other endpoints or functional assessments in the immature animal is encouraged.
- 20 Registrants are required to submit a protocol, and receive Agency approval before initiating this study.
- 21 There is concern for developmental neurotoxicity from exposure to permethrin based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study. The Agency is requiring a confirmatory developmental neurotoxicity study (DNT) for further characterization of neurotoxic effects.
- 22 All samples should be submitted to the following address:
Analytical Chemistry Laboratory / National Pesticide Standard Repository
Biological and Economic Analysis Division
USEPA, Office of Pesticides Programs
701 Mapes Road
Fort Meade, MD 20755-5350.

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY, SUITE 100 LIBERTYVILLE, IL 600486316	2. Case # and Name 2510 Permethrin Chemical # and Name Permethrin	109701	3. Date and Type of DCI and Number 28-May-2009 GENERIC ID # GDCL-109701-26467
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4. Guideline Requirement Number	5. Study Title	Applicator Exposure Data Requirements (Conventional Chemical)	P R O G R E S S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.1200	Dermal exposure--indoor	(6, 7, 8, 23)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
875.1400	Inhalation exposure--indoor	(9, 10, 11, 19)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
Residue Chemistry Data Requirements for Food Uses (Conventional Chemical)									
860.1380	Storage stability data	(1, 12, 13)				H, U, EE, I, K, Q, A, B, C, J, O	TEP or res of concn	24	
860.1500	Crop field trials(CABBAGE)	(5, 14)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(COLLARDS)	(4, 15)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(GRASS, FORAGE)	(20)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(LETTUCE, LEAF)	(3)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(PEACH)	(17)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	8	
860.1500	Crop field trials(PEAR)	(24)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(SOYBEAN, FORAGE)	(25)				H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

11. Date _____

Signature and Title of Company's Authorized Representative _____

12. Name of Company _____

13. Phone Number _____

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
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4. Guideline Requirement Number	5. Study Title	Progress Reports	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
860.1500	Crop field trials(SOYBEAN, SEED)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
860.1500	Crop field trials(TOMATO)		H, U, EE, I, K, Q, A, B, C, J, O	TEP	24	
	<u>Toxicology Data Requirements (Conventional Chemical)</u>					
870.1300	Acute inhalation toxicity		H, U, EE, I, K, Q, A, B, C, J, O	MP & TGAI	8	
870.6300	Developmental neurotoxicity study		H, U, EE, I, K, Q, A, B, C, J, O	TGAI	48	
SS850.1000	Chronic Freshwater Sediment Testing		H, U, EE, I, K, Q, A, B, C, J, O		12	
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Case # and Name: 2510 Permethrin
DCI Number: GDCL-109701-26467

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DCI Number: GDCl-109701-26467

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- | | | | |
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United States Environmental Protection
Agency Washington, D.C. 20460

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name: 2510,Permethrin

Co. Nr.	Company Name	Agent For	Address	City & State	Zip
432	BAYER ENVIRONMENTAL SCIENCE		PO Box 12014 2 T. W. ALEXANDER DRIVE	RESEARCH TRIANGLE PARK	NC 27709
73049	VALENT BIOSCIENCES CORPORATION		870 TECHNOLOGY WAY, SUITE 100	LIBERTYVILLE	IL 600486316
53883	CONTROL SOLUTIONS, INC.		5903 GENOARED BLUFF ROAD	PASADENA	TX 775071041
70506	UNITED PHOSPHORUS, INC		630 FREEDOM BUSINESS CENTER, SUITE 402	KING OF PRUSSIA	PA 19406
71532	LG LIFE SCIENCES, LTD.	AG-CHEM CONSULTING	12208 QUINQUE LANE	CLIFTON	VA 20124
33658	GHARDA CHEMICALS LTD	IPM RESOURCES LLC	4032 CROCKERS LAKE BLVD., STE 818	SARASOTA	FL 34238
1021	MCLAUGHLIN GORMLEY KING CO		8810 TENTH AVE NORTH	MINNEAPOLIS	MN 554274319
279	FMC CORP. AGRICULTURAL PRODUCTS GROUP		1735 MARKET ST, RM 1978	PHILADELPHIA	PA 19103
5481	AMVAC CHEMICAL CORPORATION		4695 MACARTHUR COURT, SUITE 1250	NEWPORT BEACH	CA 926601706
70553	MEGHMANI ORGANICS LIMITED	CHEMICAL CONSULTANTS INTERNATIONAL, INC.	16160 NALL AVENUE	STILWELL	KS 66085
8329	CLARKE MOSQUITO CONTROL PRODUCTS, INC.		110 EAST IRVING PARK ROAD, 4TH FLOOR	ROSELLE	IL 60172