

Shaughnessy #: 042501

EAB Log-Out Date: FEB 17 1988

To: Geraldine Werdig
Product Manager #50
Registration Division (TS-767C)

From: Michael P. Firestone, PhD, Chief
Special Review Section
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)

Michael P. Firestone

Thru: Paul F. Schuda, PhD, Chief
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)

Paul F. Schuda

Attached, please find the EAB review of...

Reg./File No.: 213156

Chemical: Propylene Oxide

Type Product: Fumigant

Product Name: _____

Company Name: ABERCO, Inc.

Submission Purpose: Request for Exposure Data Waiver

Date In: 28 JAN 88

ACTION CODE: 400

Date Completed: 17 FEB 88

EAB #: 80341

Deferrals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

_____ Benefits and Use Division

Monitoring study requested by EAB: XX

Monitoring study voluntarily conducted by registrant: _____

1.0 INTRODUCTION

ABERCO, Inc., has submitted a proposal to maintain its registration of 100% propylene oxide. These data are required under the Agency's Data Call-In Notice for Products Containing Propylene Oxide as an Active Ingredient which was amended by a letter dated 13 NOV 87. The registrant is requesting a waiver from submitting exposure data required under the DCI.

2.0 DISCUSSION OF DATA

EAB has reviewed the registrant's request for a waiver from submitting exposure data. This waiver is denied for the reasons set forth below.

The registrant has stated that Subdivision U of the Pesticide Assessment Guidelines is not applicable because "it [Subdivision U] pertains to the field use of insecticides...[and]...100% propylene oxide cannot be used in the field." EAB does not agree with this assertion. Subdivision U is a comprehensive guidance document set forth to aid registrants in conducting exposure studies. The guidelines are applicable to all types of uses, not just agricultural. Subdivision U makes specific reference to what types of monitoring are applicable to indoor use settings. It is for the more obscure uses, such as this one about which there are no available data in the published literature to use as a surrogate, that Subdivision U is the most useful to the registrants. Following the general approach found in the guideline will enable the registrant to determine what kind of monitoring should be done.

3.0 CONCLUSIONS

EAB will require that the registrant submit a protocol outlining the study per Subdivision U. The registrant may wish to contact someone in EAB about how to go about designing a suitable protocol. In addition, the protocol should deal with all the different use sites for this fumigant.



Karen E. Warkentien
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