



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

JUL 21 1992

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Request for Additional Information for Aluminum and Magnesium Phosphine

TO: Kerry Dearfield, Acting Section Head  
Science Support and Special Review Section  
Science Analysis and Coordination Branch  
Health Effects Division (H7509C)

FROM: Judy Smith, PhD, Chemist

*J. Smith 7/21/92*

THRU: Alan P. Nielsen, Section Head  
Reregistration and Special Projects Section  
Occupational and Residential Exposure Branch  
Health Effects Division (H7509C)

*Jim Howell For 7/21/92*

Larry C. Dorsey, Acting Chief  
Occupational and Residential Exposure Branch  
Health Effects Division (H7509C)

*Larry Dorsey 7/21/92*

OREB requests that the following items be included in the formulation of a data call-in for Aluminum and Magnesium Phosphine:

- (1) Estimates of product sales by state.
- (2) Estimate of product use by commodity for each state.
- (3) Submission of detailed application/product information manual.
- (4) A detailed discussion addressing risk mitigating techniques available for Aluminum and Magnesium Phosphine. This discussion should address:
  - a. engineering controls available at various use sites (if any);
  - b. application methodologies used with products and population at risk during application/postapplication activities at various use sites;

Kerry Dearfield  
Phosphine DCI  
Page 2

- c. exposure duration per activity, timing and number of applications per season (or year) for different commodities and uses; this should be linked with application and postapplication exposure concerns;
- d. ranges and "typical" application rates for various use scenarios;
- e. personal protective equipment used and type of clothing worn during handling activities; and,
- f. educational training programs available to individuals involved in distribution and use of the product.

Feel free to contact me at 703-305-6605 if additional information is required.

CC: Dave Thomas/BEAD