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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN 29 1993

MEMORANDUM:

SUBJECT: CLARIFICATION OF WORKER EXPOSURE DATA REQUIREMENTS FOR THE ACTIVE INGREDIENT HYDRAMETHYLNON (AMDRO)

FROM: Bruce F. Kitchens, Chemist *Bruce F. Kitchens*

TO: Kathryn Davis, PM 52
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THRU: Mark I. Dow, Ph.D., Section Head *Mark I. Dow*
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This memorandum is a follow-up to a phone conversation held with Kathleen Depukat of the Accelerated Review Branch, SRRD (4/12/93). Ms. Depukat coordinates the active ingredient hydramethylnon. Apparently, some confusion exists for Ms. Depukat regarding OREB's need for mixer/loader/applicator dermal exposure data (Subdivision U Guideline 231).

The confusion has arisen because a memo from William Dykstra (DP Barcode No. D185361) stated that the requirement for inhalation exposure could be waived. In addition, this memo stated that in an oral communication to TB-I from myself that the requirement for mixer/loader/applicator dermal exposure can be deferred until after the completion of the dermal penetration study.

Detailed Considerations:

OREB recently completed two actions regarding the dermal and inhalation exposure data requirement. The first action (D171339 9/2/92), was a request to waive the mixer/loader/applicator (M/L/A) data requirement for dermal and inhalation exposure, respectively. OREB concluded that the waiver request for M/L/A dermal exposure should be denied and that the waiver request for M/L/A inhalation exposure could be granted.

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