



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

12-3-91

DEC 3 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: REPLY TO REGISTRANT COMMENTS ON AIR MONITORING DATA
REQUIREMENTS FOR DURSBAN TC (HED Project No. 1-2256)

TO: Dennis Edwards
PM 21
Registration Division (H7505C)

FROM: David Jaquith
Special Review and Registration Section
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

THRU: Curt Lunchick, Head
Special Review and Registration Section
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Health Effects Division (H7509C)

THRU: Charles L. Trichilo, Ph.D., Chief
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Occupational and Residential Exposure Branch

Please find below the OREB review of

HED Project #: 1-2256

RD or SRRD Record #: D167784

Caswell #: 219AA

Date Received: 9/12/91 Review Time: 1 day

Date Returned: 11/27/91

Deferral to: Biological Analysis Branch/BEAD
Science Analysis & Coordination Branch
TB - Insecticide/Rodenticide Support Section
TB - Herbicide/Fungicide/Antimicrobial Support
Section



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1.0 INTRODUCTION

In November 1990 the Agency issued a memorandum requiring air monitoring data for homes treated with a 2 percent emulsion of chlorpyrifos. The registrant for this product, DowElanco, has requested an amended registration allowing application of their termiticide product Dursban TC at this increased concentration. Dursban TC is usually applied by trenching around the perimeter of the foundation or by injection into the soil, either outside or through the slab. An air monitoring study of homes treated with this product was reviewed by the Agency in 1988 (1).

2.0 CONCLUSIONS

OREB/NDEB provided an estimate of exposure resulting from application of a 2 percent emulsion in a memorandum dated January 12, 1990 (2). This document contained OREB/NDEBs best estimate of potential respiratory exposure in lieu of actual monitoring data for this concentration. This estimate was based on the conservative assumption that the air concentration would double when the concentration of the emulsion increases from 1 to 2 percent. OREB/NDEB also stated that application to indoor surfaces should not be permitted without supporting data. The registrant has since submitted an exposure study measuring dermal and respiratory exposure to chlorpyrifos applied as a broadcast treatment to carpets. This submission is currently undergoing review. If this study is found to be acceptable, it should provide adequate air monitoring data to support the application of Dursban to indoor surfaces and no further indoor air monitoring data will be necessary.

REFERENCES

- 1) Memorandum from M. Firestone (EAB) to D. Edwards dated June 28, 1988.
- 2) Memorandum from D. Jaquith (OREB/NDEB) to D. Edwards (RD) titled "Request for Label Change for Dursban TC Termiticide (HED Project No. 9-2073), dated January 12, 1990.

cc: Correspondence File
D. Jaquith/OREB
Chlorpyrifos file