



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

JUL 8 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Waiver of Reentry Data Requirement for Winter Turf
Use of Thiram

FROM: Patricia Ott, Chemist
Section #3

Patricia Ott

~~Exposure Assessment Branch~~
Hazard Evaluation Division (TS-769C)

TO: Henry Jacoby
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THRU: John Jordan, Ph.D.
Acting Section Chief
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Hazard Evaluation Division (TS-769C)

John Jordan

After consultation with Dr. James Adams, our reentry expert, we will have to defer our decision on this use pattern until the registrant submits a vapor pressure. The route of concern is inhalation because:

1. Thiram is in Toxicity Category I for the inhalation route of exposure.
2. OSHA has an air standard for thiram.

The reentry data requirement may be waived, after receipt of the vapor pressure, if it gives a saturation concentration less than the threshold limit value.

The dermal route of exposure is probably low for this use because the product is applied to turf and it is assumed golfers wear shoes.

cc: James Adams, EAB
John Tice, SIS