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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

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MEMORANDUM

SUBJECT: Exposure Data Required for Tetrachlorvinphos

FROM: Karen E. Warkentien
Special Review Section
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)

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

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

TO: Anne L. Barton, Acting Director
Hazard Evaluation Division (TS-769C)

Listed below you will find the necessary non-dietary human exposure data requirements for the development of a comprehensive exposure assessment for tetrachlorvinphos. The data requirements can be incorporated into Section II of a 3(c)2(B) Data Call-In Notice if the Agency should decide to seek data via this route. The specific language for such a DCI is as follows.

Section II. DATA REQUIRED

A. DATA NEEDED

1. Exposure Data Required
a. Personal Exposure Monitoring Data

You are required to carry out a series of studies of human exposure to tetrachlorvinphos resulting from the use patterns detailed below. Potential dermal and/or inhalation exposure during each activity, as required, must be measured using personal monitoring techniques approved by the Agency. Monitoring must be done separately for each task, even if the same individual may perform more than one task. At least 15 replicates must be performed for each requirement. A replicate,

requires monitoring the total exposure over the course of a work function or, in the case of post-application exposure, over sufficient time to encompass normal daily routines and also to adequately establish a decay constant for tetrachlorvinphos surface residues and air concentrations. All precautionary statements on the label must be followed during the conduct of the work being monitored. All quality assurance considerations for both sampling and subsequent laboratory analyses must be discussed in the protocol and approved by the Agency. For further guidance, you should refer to EPA's Pesticide Assessment Guidelines, Subdivision U, Applicator Exposure Monitoring, and Subdivision K, Exposure: Reentry Protection.

The following use patterns must be monitored during the mixing, loading and application of tetrachlorvinphos:

1. Feed Additive - Dermal and Inhalation Exposure
2. Agricultural Premise Spray - Dermal and Inhalation Exposure
3. Large Animal Spray - Dermal and Inhalation Exposure
4. Large Animal Dust - Dermal and Inhalation Exposure
5. Recreational Areas - Dermal and Inhalation Exposure
6. Garbage Dumps - Dermal and Inhalation Exposure
7. Manure Spray - Dermal and Inhalation Exposure
8. Poultry Spray - Dermal and Inhalation Exposure

The following use patterns must be monitored for post-application (reentry) exposure to the residues and vapors of tetrachlorvinphos:

1. Agricultural Premise Spray - Dermal and Inhalation Exposure
2. Manure Spray - Dermal and Inhalation Exposure
3. Poultry Spray - Dermal and Inhalation Exposure

B. <u>SCHEDULES FOR SUBMISSION OF DATA</u>

Data must be submitted according to the following schedules:

1. <u>Exposure Data</u>

   - A proposed protocol for the generation of these data must be submitted to the Agency for approval within 90 days of receipt of this notice.

   - The final report must be submitted within nine months of acceptance of the protocol.

cc: Amy Rispin, SIMS/HED (TS-769C)
Jan Auerbach, SRB/RD (TS-767C)

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