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

MAR 26 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: NEW CHEMICAL SCREEN FOR DECAMETHRIN
(DELTAMETHRIN) USE ON COTTON

TO: Anne L. Barton, Director
Environmental Fate and Effects Division (H7507C)

FROM: Arthur O. Schlosser, Chemist *Arthur O. Schlosser*
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Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

THRU: Mark Dow Ph.D., Head *Mark Dow*
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Charles L. Trichilo, Ph.D., Chief
Occupational and Residential Exposure Branch
Health Effects Division (H7509C) *Charles L. Trichilo*

This is in response to your memo of March 18, 1992 requesting a new chemical screen for the active ingredient, decamethrin (also called deltamethrin). The end-use product, Decis Insecticide, is proposed for use on cotton. The label bears the signal word "Danger" and also indicates that it is a "Restricted Use Pesticide". The recommended application rate is 0.013-0.020 lbs ai/acre and a maximum of ten applications per growing season is permitted.

CONCLUSIONS/RECOMMENDATIONS

Relevant toxicity data are not available to allow OREB to definitely determine whether Decis Insecticide should Pass or Fail the new chemical screen. The registrant's claim that post-application exposure is not reasonably foreseen does not recognize the practice of crop "scouting" for treatment effectiveness. Worker exposure can occur as a result of this activity. The registrant should be informed that exposure data to support the use of decamethrin on cotton may be needed based on the results of relevant toxicology reviews.

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DISCUSSION

Tox Oneliner information available to the reviewer does not appear to be current, and does not agree with information submitted by the registrant for this registration. Therefore, OREB cannot determine at this time whether toxicology "triggers" exist to cause exposure data requirements. No exposure data were included in the current submittal.

The registrant claims that reentry data would not be required for Decis Insecticide because human exposure to residues of the pesticide is not reasonably foreseen. This does not recognize the practice of scouting treated crops to assess spray effectiveness.

cc: A. Schlosser/OREB (H7509C)
Rose Mary Kearns SACS/EFED (H7507C)
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Circulation