

## Memorandum

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George Reese, Unit Chief  
Pesticide Registration

Date : November 14, 1983

Place : Sacramento  
5-8474

From : Department of Food and Agriculture - Keith T. Maddy, Unit Chief/Staff Toxicologist  
Worker Health and Safety Unit

Subject: Proposed Registration of 1.5% Granules - *Oflanol - Mobay Chem. Co.*

I do not recommend registration at this time of 1.5% granular because of ongoing studies by the Department will provide more information on 1) efficacy of treatment for overexposure, 2) potential for delayed-onset neurotoxicity induction and, 3) fate in soil profile subsequent to treatment. Such data should be available in 60 days.

Separately, the proposed use instructions are considered as inadequately mitigating the hazards of use. I believe these are of such magnitude that registration should not be granted.

The user is not advised to wear rubber gloves when handling the product, he is only told to "avoid contact with skin".

1. The use instructions state, "Harmful if swallowed". The user and his physician are not told what to do if the product is swallowed.
2. The use instructions state "If in eyes, flush with plenty of water". The standard EPA required statement is "Flush with running water for 15 minutes".
3. The user and his physician are not told that this product is a cholinesterase inhibitor.
4. The user is not informed of typical symptoms of overexposure.
5. The physician is not told if 2 PAM and atropine are antidotal.
6. The applicator is not told "immediately after application, water this pesticide into the soil with the equivalent of one inch of water and be sure that people and pets do not have skin contact with treated turf until the turf has dried".

The instructions as given in the draft use instructions for watering in. do not apply for some uses, and can be delayed for as long as 24 hours for other uses.

Data were not provided to assure us that children can walk around and play in sun-suits on recently treated turf before it is watered in and before the turf has dried.

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This kind of "EPA approved labeling" should be discussed with Ed Johnston.

KIM/lm