



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

5/18/1990

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Section 18 - Amendments to Specific Exemptions for Use of Oxyfluorfen (Goal) on Raspberries in Oregon and Washington --ACTION MEMORANDUM --

FROM: Anne E. Lindsay, Director
Registration Division

TO: Douglas D. Campt, Director
Office of Pesticide Programs

I. APPLICANTS' REQUEST:

On March 26, 1990, EPA granted specific exemptions to the Oregon and Washington Departments of Agriculture for use of oxyfluorfen to suppress primocanes in raspberries. Under the terms of the exemption, both states are required to monitor worker exposure to oxyfluorfen. Monitoring was required at the request of the Non-Dietary Exposure Branch (NDEB) so that a quantified exposure risk assessment could be conducted in connection with any future exemption requests for this use. Currently available data are inadequate for this purpose.

Both Oregon and Washington have asked the Agency to amend their exemptions by removing this monitoring requirement. The Applicants argue that there is insufficient time to develop acceptable study protocols and generate useful risk assessment data. In addition, the Applicants point out that the Registrant, Rohm and Haas, conducted a 1989 applicator exposure study in California which may satisfy the Agency's monitoring requirements, thereby eliminating the need for additional exposure data.

II. EPA EVALUATION:

NDEB was contacted regarding the Applicants' requests to eliminate the exposure monitoring requirement. The reviewer who initially recommended the monitoring requirement agreed that there may be insufficient time to plan and conduct an appropriate study this season. While he was not previously aware of Rohm and Haas's 1989 applicator study, he also agreed that this study might satisfy the exposure requirement. Therefore, NDEB has no objections to deletion of the monitoring requirement this season, provided the Applicants either submit acceptable monitoring study protocols with any future request or can demonstrate that data

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recently collected by the Registrant are adequate to assess the risk associated with the use of oxyfluorfen on raspberries.

Tom Rogerson, Registration Specialist with Rohm and Haas, confirmed that his company conducted an applicator exposure study in tree nut orchards in 1989, which the company had planned to hold for reregistration. However, Mr. Rogerson agreed to submit the study to EPA for immediate review in support of the raspberry exemptions. The study was received April 27, 1990, and will be forwarded to NDEB to determine whether these data are adequate to conduct a quantified risk assessment for the use of oxyfluorfen on raspberries.

III. RECOMMENDATION:

I recommend that the specific exemptions granted to the Oregon and Washington Departments of Agriculture for use of oxyfluorfen on raspberries be amended by revising item 7 of the authorizing telegrams to read as follows:

7. All persons involved in the mixing, loading, and application of oxyfluorfen must wear proper protective clothing, including fabric (such as cotton) coveralls over a long sleeve shirt and long pants and chemical resistant gloves and boots.

The Agency is currently reviewing an oxyfluorfen applicator exposure study conducted in tree nut orchards in California to determine whether these data are adequate to assess the risk to workers from use of oxyfluorfen on raspberries. The Agency will notify you of the results of this review when they are available. In the event these data are determined to be inadequate for this purpose, worker exposure monitoring will be required as a condition of any future emergency exemption for use of oxyfluorfen on raspberries, and an acceptable worker exposure study protocol must be submitted with any future request for this use.

Approve: _____

Disapprove: _____

Date: MAY 18 1990