

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:


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SUBJECT: Larvin EUP on Soybeans and Cottonseed

FROM: Chemist
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TO: Bill Dykstra
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THRU: Chief
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The levels of mixer/loader, pilot and flagger exposure to Larvin for the soybean and cottonseed uses are not known. In support of its petition Union Carbide has submitted only the results of a carbaryl home and garden exposure study. This study is totally inappropriate for extrapolation to aerial application and is therefore not acceptable for determination of mixer/loader, pilot, or flagger exposure to Larvin. In addition, the carbaryl home and garden exposure study itself has been reviewed (July 5, 1979 memo to SPRD) and found to be inadequate even for estimation of home and garden exposure due the atypical meteorological conditions under which the study was performed. Therefore, the levels of mixer/loader, pilot and flagger exposure to Larvin remain a data gap to be filled by the petitioner.


Abraham Mittelman