



Adams - Gile

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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

FEBRUARY 25, 1988

1

MEMORANDUM

SUBJECT: ICI's Request for Waiver from Requirement of Reentry  
Data for KARATE®

TO: Christine Dively, PM 15  
Insecticide Branch, RD / (TS-767C)

FROM: James D. Adams, Chemist *James D. Adams*  
Exposure Assessment Branch HED (TS-769C)

In the Registrant's October 26, 1987 letter to you, they asked for a waiver from the reentry data requirement. That request is not valid and should be denied. First, they say that "...cropping practices for cotton do not include reentry by farm workers therefore (sic) the need for this type of data is not triggered." It is true that reentry data are only required under 40 CFR § 158.140 for a pesticide if it is used on a crop whose cultural practices are characterized by a high likelihood of exposure of persons who enter sites treated with the pesticide. But, it is not true that no worker re-enters treated cotton fields. It is now common practice in well-managed cotton fields for scouts to reenter a few days after pesticide treatment. Also, as recently as July, 1986; a group of 17 workers became sick while weeding/hoeing cotton in a field near Fresno, California. Although Methamidophos and not Karate was the pesticide implicated, it shows that fieldworker poisonings can and do occur in treated cotton fields. Reentry data have been required for other pesticides used on cotton.

The Registrant also contends that the fact that reentry data have not been required for other synthetic pyrethroids substantiates their waiver request. This contention is not relevant. Those pesticides may not have had sufficient toxicity potential to cause concern for fieldworkers exposed to the residues. Reentry data are only required under 40 CFR § 158.140 if the pesticide and/or its environmental degradates meet any of certain toxicity criteria. The other pesticides may not have met those criteria or may have been registered before 40 CFR 158 was promulgated. If the latter is true, reentry hazards for those pesticides are or will be addressed under Data Call-In or Registration Standard actions in the future.

Pam Hurley, Tox Branch (HED), reports that at least one KARATE formulation is a potent dermal irritant. That is sufficient to trigger the requirement of reentry data unless the dermal irritation potential is related only to a fugitive material in the formulation, i.e. is not caused by the active ingredient or its degradates. Reentry data have been required for a number of pesticides based on their tendencies to cause dermal problems. In fact, dermal irritation is the most frequent pesticide related complaint of farmworkers, and certain formulations of certain pesticides have greater tendencies to cause dermal problems in the field than others. The classic case was the wide-spread occurrence of extreme skin problems when a new formulation of Omite was introduced. The Registrant withdrew that formulation but not before it had caused a considerable amount of fieldworker distress, lost work-time, bad publicity, and grower dissatisfaction.