



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

PC Code: 066501

Date: 12/30/10

SUBJECT: Verification Memorandum for Aluminum Phosphide for SF Bay Species

FROM: Matthew Lloyd, Team Leader
Risk Management and Implementation Branch 2
Pesticide Re-evaluation Division (7508P)

Handwritten signature of Matthew Lloyd in blue ink.

THROUGH: Mary Manibusan, Chief
Risk Management and Implementation Branch 2
Pesticide Re-evaluation Division (7508P)

Handwritten signature of Mary Manibusan in black ink.

TO: Edward Odenkirchen/Steve Wente
Environmental Risk Branch 1
Ecological Fate & Effects Division (7507P)

This memorandum serves to provide additional information on the use pattern of aluminum phosphide not captured in the LUIS process. RD and PRD's role in the verification process are to fill information gaps and provide appropriate expertise as outlined in the LUIS Verification SOP for RD and PRD.

PRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

¹ This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain: 1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active California special local needs (SLN) registrations.

This memorandum covers the use of aluminum phosphide as a product and commodity fumigant. Finally, if further clarification is needed, please contact Matthew Lloyd (703-308-0130).

Registration and Reregistration Verification

Date and Scope of the RED

- The RED for aluminum phosphide was issued in December 1998. No uses were cancelled as part of the RED process, although all the aluminum phosphide uses required mitigation. The Agency announced expanded use restrictions to reduce risks of aluminum phosphide in April 2010.
- Magnesium phosphide (PC Code: 066504) was also evaluated in the RED.

Label Uses / Rates and Mitigation

- The aluminum phosphide LUIS reports are not "Data Doer Only" reports and include all active Section 3 registrations and all California Section 24(c) registrations for aluminum phosphide.
- The application rates of aluminum phosphide on the LUIS report are up to date.
- In 2000, the Agency signed a Memorandum of Agreement (MOA) with registrants of pesticide fumigant products containing aluminum phosphide to reduce worker and bystander risk. Major provisions of the MOA include:
 - Fumigation Management Plans
 - Incident Reporting
 - Monitoring Studies
 - Worker Exposure Limits
 - Training and Certification
 - Prohibition of in-transit aeration
 - Specific instructions on when a certified applicator must be present
 - Enhancement of notification of receivers of fumigated rail cars and other containers
 - Two-person rules for fumigations requiring entry into a structure, and
 - Safety material for residents having burrows treated.
- In 2010, the Agency expanded use restrictions to reduce risks of aluminum phosphide exposure. The outdoor use restrictions include:
 - Use is strictly prohibited around all residential areas, including single and multi-family residential properties, nursing homes, schools (except athletic fields, where use may continue), day care facilities, and hospitals.
 - The products must only be used outdoors for control of burrowing pests, and are for use only on agricultural areas, orchards, non-crop areas (such as pasture and rangeland), golf courses, athletic fields, parks and recreational areas, cemeteries, airports, rights-of-way, earthen dams, and other non-residential institutional or industrial sites.
 - Products must not be applied in a burrow system that is within 100 feet of a building that is or may be occupied by people or domestic animals. This buffer zone for treatment around non-residential buildings that could be occupied by people or animals has been increased from 15 feet to 100 feet.

- When this product is used in athletic fields or parks, the applicator must post a sign at entrances to the treated site containing the signal word DANGER/PELIGRO, skull and crossbones, the words: DO NOT ENTER/NO ENTRE, FIELD NOT FOR USE, the name and EPA registration number of the fumigant, and a 24-hour emergency response number. Signs may be removed 2 days after the final treatment.
- When this product is used out-of-doors in a site frequented by people, other than an athletic field or park, the applicator shall post a sign at the application site containing the signal word DANGER/PELIGRO, skull and crossbones, the name and EPA registration number of the fumigant, and a 24-hour emergency response number. Signs may be removed 2 days after the final treatment.
- Fumigant Management Plans must be written before all applications of phosphine products, including all burrowing pest fumigations. A Fumigant Management Plan is a written description of the steps designed to plan for a safe, legal and effective fumigation. The certified applicator and owner of the property to be fumigated must characterize the area to be treated and include all safety requirements in the plan before application.

Product Reregistration

- All aluminum phosphide products were re-registered in 2010.
- The next product review will be conducted as part of registration review beginning in 2013.

Registration Division Review

- As of 12/20/10, RD confirmed there are no new actions that impact the use or application of aluminum phosphide (including new uses, deletion of uses, changes to application parameters, etc.).



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MEMORANDUM

PC Code: 066504

Date: 12/30/10

SUBJECT: Verification Memorandum for Magnesium Phosphide for SF Bay Species

FROM: Matthew Lloyd, Team Leader
Risk Management and Implementation Branch 2
Pesticide Re-evaluation Division (7508P)

THROUGH: Mary Manibusan, Chief
Risk Management and Implementation Branch 2
Pesticide Re-evaluation Division (7508P)

TO: Edward Odenkirchen/Steve Wentz
Environmental Risk Branch 1
Ecological Fate & Effects Division (7507P)

This memorandum serves to provide additional information on the use pattern of magnesium phosphide not captured in the LUIS process. RD and PRD's role in the verification process are to fill information gaps and provide appropriate expertise as outlined in the LUIS Verification SOP for RD and PRD.

PRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

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This memorandum covers the use of magnesium phosphide as a product and commodity fumigant. Finally, if further clarification is needed, please contact Matthew Lloyd (703-308-0130).

Registration and Reregistration Verification

Date and Scope of the RED

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- Aluminum phosphide (PC Code: 066501) was also evaluated in the RED.

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