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

APR 23 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: LABEL AMENDMENTS FOR DURSBAN TC

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TO: John Redden
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Please find below the OREB review of

DP Barcode: D233121 Pesticide Chemical Code: 059101

EPA Reg. No.: 62719-47

Deferral to:

PHED: N/A

INTRODUCTION

OREB has been requested to review proposed label amendments submitted by DowElanco for its termiticide product Dursban TC. Dursban TC is an emulsifiable concentrate containing 44 percent chlorpyrifos as the active ingredient (4 lbs ai per gallon). It is to be used by licensed or registered individuals or firms only. Specifically, OREB has been requested to address changes in the required protective clothing required by the current label. The revised label, which was received by the Agency on December 23, 1996, reads:

"Personal Protective Equipment (PPE)

Mixers and loaders must wear a minimum of long-sleeved shirt and long pants, chemical-resistant footwear, chemical-resistant gloves, and protective eyewear (goggles, a faceshield, or safety glasses with front, brow, and temple protection). **Mixers and loaders** who do not use a mechanical system (such as the Voyager™ container or in-line injector) to transfer the contents of this container must wear coveralls or chemical-resistant apron in addition to other required PPE.

Pesticide Applicators must wear long-sleeved shirts and long pants, socks, shoes, and chemical-resistant gloves.

In addition, all pesticide handlers must wear a respiratory protection device (MSHA/NIOSH approved number TC-21C) and protective eyewear when working in a non-ventilated space and all pesticide applicators must wear protective eyewear when applying termiticide by rodding or sub-slab injection."

The registrant also indicates that applicable exposure calculations were done for the Reregistration Eligibility Document (RED) for chlorpyrifos and should be included in that document.

CONCLUSIONS

The Voyager termiticide delivery system presented by the registrant consists of a reusable steel container (7.5 or 15 gallons) fastened to the truck and containing the concentrate. The termiticide is pumped from this container to a measuring vessel which, when the right amount has been metered, is emptied by hose into the termiticide mix tank. At no time during this process is the concentrate subject to positive pressure and the technician should not be in contact with the pesticide.

The In-line Injector system is designed to eliminate the mixing/loading task completely. The device injects and mixes the appropriate amount of termiticide directly into the

water from the tank. Each unit is marked with the dilution ratio, product to be used, and product concentration.

OREB encourages the use of closed systems and returnable containers whenever feasible. While OREB has no quantitative data with which to measure the exposures of these individuals, it would be expected that exposures would be much lower than those occurring when open pour mixing/loading is used. Since the termiticide is not under pressure when the Voyager system is used and the concentrate tank is not handled, catastrophic exposures or large scale spillage would be unlikely to occur. In the case of the in-line injector system, the mixing apparatus is located at the water tank, away from the applicator. It is unlikely that the applicator would be exposed since the mixing apparatus is located away from the applicator and is no handling of the concentrate container occurs. Given these conditions, OREB has no problem with the changes in label language concerning protective clothing proposed by the registrant. Changes in the use patterns are beyond the purview of OREB and should be addressed by other parts of OPP.

The calculations provided by OREB for the RED were for mixer/loader/applicators using conventional open pour technology. Since these are still allowed by the proposed label OREB concurs with the registrant that these are appropriate for inclusion in the RED. In order to refine these estimates to address potential exposures using the newer technologies, additional exposure studies would be necessary. OREB sees no need for such studies at this time.

cc: Chlorpyrifos file
Correspondence file
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