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

JUL 21 1992

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Request for Additional Information for Aluminum and Magnesium Phosphine

TO: Kerry Dearfield, Acting Section Head
Science Support and Special Review Section
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

FROM: Judy Smith, PhD, Chemist

J. Smith 7/21/92

THRU: Alan P. Nielsen, Section Head
Reregistration and Special Projects Section
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

Jim Howell For 7/21/92

Larry C. Dorsey, Acting Chief
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

Larry Dorsey 7/21/92

OREB requests that the following items be included in the formulation of a data call-in for Aluminum and Magnesium Phosphine:

- (1) Estimates of product sales by state.
- (2) Estimate of product use by commodity for each state.
- (3) Submission of detailed application/product information manual.
- (4) A detailed discussion addressing risk mitigating techniques available for Aluminum and Magnesium Phosphine. This discussion should address:
 - a. engineering controls available at various use sites (if any);
 - b. application methodologies used with products and population at risk during application/postapplication activities at various use sites;

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- c. exposure duration per activity, timing and number of applications per season (or year) for different commodities and uses; this should be linked with application and postapplication exposure concerns;
- d. ranges and "typical" application rates for various use scenarios;
- e. personal protective equipment used and type of clothing worn during handling activities; and,
- f. educational training programs available to individuals involved in distribution and use of the product.

Feel free to contact me at 703-305-6605 if additional information is required.

CC: Dave Thomas/BEAD