MEMORANDUM:

SUBJECT: ACCUDOSE INSECTICIDE AEROSOL (DP D194705, 006959-1E)

FROM: Bruce F. Kitchens, Chemist

TO: Richard Mountfort, PM 10
   Insecticide-Rodenticide Branch
   Registration Division (H7505C)

THRU: Mark I. Dow, Ph.D., Section Head
       Special Review and Registration Section II

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

       As per our conversation on 11/10/93 I have received your cc-
       Mail message with the additional questions you voiced concerning
       Accudose Insecticide Aerosol (a.i. pyrethrin).

       In last line of the opening paragraph you commented that
       typical worker exposure assumptions should not be made in this
       setting. Because of the scarcity of data, I have provided the best
       available exposure assessment. In this particular case we are
       basically assessing human exposure after re-entry into a treated
       area (pools, decks, and terraces).

       Question 1

       Should unrestricted use be allowed around pools, decks, and
       terraces?

       It is not certain what is meant by unrestricted use. However,
       there should not be an unlimited number of sprayings per day
       or unlimited amounts of the formulation sprayed around pools,
       decks, or terraces.
Question 2

If not, what should the restrictions be?

The registrant should establish re-entry periods and state them clearly and concisely on the label. OREB does not typically set homeowner re-entry intervals.

Question 3

Should the labeling clearly indicate frequency of applications? If so, what would be appropriate for use?

The label should indicate the frequency of application. OREB cannot determine application frequency.

Question 4

What is the significance of the worker exposure data you have provided? How does this data relate to unrestricted human exposure (around pools and decks) for persons with little or no protective clothing?

The worker exposure data is most likely the most conservative estimate of human exposure that can occur in treated areas around pools, decks, or terraces. It is unlikely that individuals entering treated areas would be outfitted in protective clothing, so any exposure incurred would be a total deposition type exposure.

cc: B. Kitchens
Bob Brennis: 7505C
Chemical File
Circulation
Correspondence