

US EPA ARCHIVE DOCUMENT

Jan folpet FYI  
Valerie

MEMORANDUM

MAR 26 1987

SUBJECT: 3/26/87 MEETING MINUTES - FOLPET  
10 a.m. to 11 a.m.

TO: Folpet Meeting Minutes File

FROM: Valerie M. Bael, Review Manager  
SRB/RD *Valerie*

A meeting was held to discuss labeling requirements currently proposed in the draft folpet Registration Standard. In attendance were Valerie Bael (SRB), Jay Ellenberger (SRB), Alan Reiter (EAB), Eugene Wilson (RD), Tina Levine (SIS), Arty Williams (RD), and Tim Hunt (OPPE). A copy of the agenda is attached.

The team agreed that based on high developmental MOSS (340 - 47,000) for M/L/A, the "Restricted Use" and developmental effects warning label on end-use products should be eliminated. It was proposed that the re-entry interval for folpet be reduced from 4 days (similar to captan) to 24 hours (similar to captafol). This decision was based on a developmental MOS of 500 which was calculated using surrogate captan data on strawberries and folpet's dermal absorption rate of 0.4%. Folpet re-entry data is being required in the Registration Standard. The issue concerning whether to require protective clothing for M/L/A was resolved. The developmental M/L/A risk from use of folpet ranges from (MOS) 340 to 47,000 without protective clothing (folpet exposure estimates are based on the M/L/A wearing long pants and short sleeve shirts, exposing 3,000 cm. skin). Based on these risk figures, it appears that a requirement for additional protective clothing (i.e., gloves) is not warranted. It was recommended that mixer/loader/applicators as well as persons re-entering treated areas within 24 hours following folpet application, wear long pants and long sleeve shirts. Protective clothing requirements for fieldworkers, harvesters, and homeowners will be deleted from the Registration Standard. At the close of the meeting, Tim Hunt asked that we bring up the issue of asking for efficacy data through the Registration Standard to upper management. The meeting ended at 11 a.m. Eugene Wilson agreed to revise the Registration Standard accordingly. A Briefing Paper incorporating these changes will be generated and presented to Rick Tinsworth and Jack Moore.

FOLPET

March 26, 1987, Meeting Agenda Topics

ISSUE:

Based on revised M/L/A developmental risk MOSs ranging from 340 (agricultural) to 47,000 (home gardener), should certain labeling regulations currently in the Registration Standard be eliminated?

1. "Restricted Use" on all folpet end-use products containing greater than 20% folpet (except industrial use products).
  - No oncogenic M/L/A risks due to folpet's activity in human blood
  - M/L/A developmental risk MOSs 340-47,000 (w/o protective cl)
  - Neither captan or captafol have this restriction
2. Developmental Effects Warning Label
  - M/L/A MOSs high
  - Dietary risks MOSs 33-90 based on 100% tolerances (expected to decrease one order of magnitude with residues data)
3. Re-entry interval of 4 days
  - based on captan's fieldworker exposure for strawberries
  - we have no re-entry data for folpet - why not use 24-hour as in captafol (same argument)
  - re-entry for captan and captafol based on M/L/A oncogenic risks of  $10^{-5}$  to  $10^{-7}$ . Folpet risks estimated at  $10^{-7}$  but not considered possible due to activity of folpet in blood.
4. Protective clothing
  - MOS 340 to 47,000 without protective clothing
  - protective clothing required in captan and captafol for oncogenic M/L/A risks of  $10^{-5}$  to  $10^{-7}$ . folpet estimated at  $10^{-7}$ .
  - when applied to crops usually mixed with insecticides which are more toxic. Applicators more prone to wear gloves
  - homeowner and paint uses - no data to estimate
  - current labels: agricultural - no statement  
home and garden - no statement  
paint uses - recommend gloves