MEMORANDUM

SUBJECT: REQUEST FOR A WAIVER OF ACEPHATE HANDLER EXPOSURE DATA FOR USE ON TOBACCO (HED Project# 9-0922)

TO: William H. Miller
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    Registration Division (H7505C)

FROM: Arthur O. Schlosser, Chemist
       Review Section 1
       Non-Dietary Exposure Branch/HED (H7509C)

THRU: Michael P. Firestone, Ph.D., Chief
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       Non-Dietary Exposure Branch/HED (H7509C)

THRU: Charles L. Trichilo, Ph.D., Chief
       Non-Dietary Exposure Branch/HED (H7509C)

Please find below the NDEB review of.....

Record #: 240329

Caswell #: 2A

Date Received: 2/23/89

Review Time: 0.5 days

Deferral to:

1. Biological Analysis Branch/BEAD
2. Science Analysis and Coordination Branch
3. TB- Insecticide/Rodenticide Support
4. TB- Herbicide/Fungicide/Antimicrobial
1.0 INTRODUCTION

The registrant, Valent, is requesting a waiver of exposure data for use of the active ingredient acephate on tobacco. The waiver is based on the fact that acephate is classified as a "non-quantifiable" carcinogen. In addition, they state that in a meeting with Dr. Michael Firestone (NDEB) on December 7, 1988 they were advised that exposure data for the use of acephate on tobacco were not required since available surrogate data has already been used by NDEB to evaluate handler exposure resulting from this use.

2.0 DISCUSSION

Acephate has been classified as a C, non-quantifiable carcinogen, and there are no plans by the Agency to do a quantitative risk assessment on it at this time. An exposure assessment for acephate use on tobacco using HED's surrogate data base has already been done (See EAB 80812 dated June 23, 1988).

3.0 CONCLUSIONS

Because of its classification as a class C, non-quantifiable, carcinogen there is no need for further worker exposure data to support the use of acephate on tobacco.

4.0 RECOMMENDATION

NDEB recommends that the request for a waiver of exposure data for the use of acephate on tobacco be granted.

cc: Sue Rathman
    TB-IRS
    SACB
    Correspondence file
    Acephate file
    Circulation