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

**OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES**

March 3, 2008

**MEMORANDUM**

**SUBJECT:** Revised Phorate RED

**TO:** Phorate Docket (EPA-HQ-OPP-2008-0174)

**FROM:** Steven Bradbury, Ph.D.  
Director, Special Review and Reregistration Division

This memo pertains to the requirement for a 25% application rate reduction for all uses of phorate to mitigate potential post-application risks to workers, as outlined in the 2001 phorate Interim Reregistration Eligibility Decision (IRED). The phorate IRED became a Reregistration Eligibility Decision (RED) in July 2006, when the organophosphate cumulative risk assessment was completed.

Phorate is typically applied at planting and is incorporated into the soil. It is persistent in soil, and residues are potentially available for post-application worker exposure several weeks after application. In the 2001 IRED, a quantitative assessment of post-application risks was not conducted because the Agency lacked sufficient information on agricultural practices and relevant data on residue transfers from soil. Based on the qualitative evaluation of the availability of residues for post-application exposure, the Agency required a 25% application rate reduction for all phorate uses, unless efficacy data demonstrated that the lower rate was ineffective.

Based on preliminary information from the technical registrant indicating that phorate may not be effective at a 25% reduced rate, and in light of the fact that the Agency now has improved information about agricultural practices for many of the crops on the phorate label, the Agency is currently reevaluating the need for the 25% rate reduction. EPA's Biological and Economic Analysis Division will be reviewing available data to determine if cultural activities for the labeled crops involve soil contact. If so, the Health Effects Division will conduct a new post-application risk assessment.

Although phorate is scheduled for registration review in early fiscal year 2009, the Agency is proceeding immediately with its reevaluation of post-application worker risk. Based on the findings of this new evaluation, the Agency may find it necessary to implement additional

mitigation measures in order to reduce the potential for post-application worker exposure. In the interim, all phorate labels are eligible for reregistration if they contain all label requirements outlined in the 2001 Phorate IRED, with the exception of the 25% rate reduction discussed in this memorandum.

If you have any questions and/or concerns regarding the information provided herein, please contact the Chemical Review Manager, John W. Pates, Jr., at 703-308-8195.