

Patricia D. Hastings

From: "Patricia Hastings" <hastings@AESOP.Rutgers.edu>
To: "Patricia D. Hastings" <hastings@AESOP.Rutgers.edu>
Sent: Wednesday, November 16, 2005 7:16 PM
Subject: IMPT NEIPMC SNPs: Malathion REI Input Needed for Reregistration Eligibility Decision

Attention NEIPM SNPs:

Dear Colleagues:

The close of the 60 day comment period for the revised risk assessment for malathion is November 22. I have responded to those who have asked me for feedback thus far. In my October 4 email, I promised more details from EPA to explain the attached REI tables. While I have a new table, I am awaiting a list of EPA questions to accompany the table. EPA will consider REI discussions as risk mitigation and will not penalize grower groups for not commenting on the proposed REIs.

The REI discussion will begin perhaps next week with receipt of the additional information. EPA will contact some grower groups directly but keep USDA involved. Please contact me if you have questions at anytime. With other grower groups, I will be contacting you and keeping EPA informed. This will be a two-phase process: (1) determine if the proposed REIs are problematic to any group (2) determine what REIs can be achieved when considering actual use rates, numbers of applications and the day intervals between applications (this affects ecological and drinking water risk).

Lastly, because the registrant will be submitting new data, the risk assessment could change.

EPA still has a goal to complete the RED by February/March 2006 so there will be considerable discussion during January.

Please do not hesitate to contact me if you have questions. No information is being requested from you at this time.

Teung

October 4, 2005

Dear Colleagues:

On September 22, EPA released the revised risk assessment for malathion to the public. It is now been posted on the EPA edocket. All the science chapters are available for review on that site. The EPA Overview of the Revised Risk Assessment is attached below.

Also, per the attached Federal Register Notice below, stakeholder comments are due on November 22.

A conference call involving EPA to discuss the risk assessment is being planned for some weeks from now.

While there may be further refinements to the EPA risk assessment for residential exposure, it is not expected that worker reentry calculations will change from the present EPA proposals. In the next weeks, I will be sending out a table prepared by EPA on any changes to REIs. At that time I will be soliciting feedback specific to your crop(s) as to the feasibility of the EPA proposals or the accuracy of EPA's assumptions in terms of pounds of a.i. used, the intervals between applications, PHIs, timing of applications, or timing of re-entry relative to when the last application has taken place. We anticipate that a two-step procedure will be involved: growers' initial thoughts on the proposed REIs and then an in-depth discussion by individual commodity groups.

Any changes to accommodate post-application worker risk could also affect ecological risk mitigation considerations. Drinking water will also be discussed later in the weeks ahead.

I am sending ahead a table from the EPA risk assessment (more explanation to follow from EPA) and a list of the reassessed tolerances for malathion as a heads up.

Please look forward to my next email and do not hesitate to contact me in the interim. No information is being requested of you at this time.

EPA has a goal to complete risk mitigation decisions and its reregistration eligibility decision by February-March 2006.

Teung Chin

Public Docket for Malathion

<http://docket.epa.gov/edkpub/do/EDKStaffCollectionDetailView?objectId=0b0007d48043e501>

Overview of the Malathion Revised Risk Assessment

(See attached file: MalathionOverview092305-OPP-2004-0348-0002.pdf)

9/23/05 Federal Register Notice Vol. 70, No. 184. Pages 55839-42.

"Malathion; Revised Risk Assessments, Notice of Availability, and Solicitation of Risk Reduction Options"

<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/pdf/05-18705.pdf>

(See attached file: Malathion092305FR-Notice05-18705.pdf)

"This note also solicits information or data from stakeholders and interested parties to help refine the malathion risk assessment, and encourages parties to suggest risk management ideas or proposals to address the potential risks , which have been identified.".....

"Malathion is characterized as a non-systemic, broad spectrum organophosphate pesticide with numerous commercial agricultural uses, residential uses, and, as well as several wide area uses. Malathion's wide area applications include use as a public health mosquitocide, used to control fruit flies, and use in the eradication programs such as the U.S. Department of Agriculture's Boll Weevil Eradication Program. Malathion is also formulated into a pharmaceutical product (Ovide Lotion) which is approved by the Food and Drug Administration for the control of head lice and their ova....."

"EPA's revised and human health risk assessment has identified potential risks of concern from various uses of malathion, some of which are derived mainly from potential exposure to malathion's oxygen metabolite, malaaxon. Concerns include potential exposure to malathion through drinking water, and from drift as a result of wide area applications. The agency also has potential risk concerns for adults and children who may be exposed to malathion and per se from the home fogger use of malathion. EPA has also included an analysis of the pharmaceutical use of malathion. The analysis of the pharmaceutical use presents the proposed safety findings on malathion and as a pharmaceutical and a pesticide product from the joint perspective of both the Food and Drug Administration and EPA."

"The Agency is interested in receiving information which would help refined the identified risk, and information on effective and practical measures to mitigate potential risk. Information or data that could refined uncertainties, or risk estimates that exceed the Agency's level of concern are of particular concern to the agency. Because EPA notes that estimated dietary risks differ significantly between calculations made with maximum and typical application parameters, the Agency is interested in information on typical use patterns (rates, number of applications, or application intervals) for commercial agricultural crops. EPA notes that in conducting its occupational assessment, exposure data were unavailable for two specific application scenarios, (1) power dusters, and (2) plant dipping scenarios, and is requesting additional information on either of these applications scenarios. In addition, information is requested on the feasibility of the levels of protection assessed for pesticide handlers, and the maximum restricted entry intervals being evaluated, as well as the type of post-application activities which need to be performed for the scenarios assessed. With respect to the estimated risk from wide area treatments, EPA notes that additional data on the transformation of malathion to malaaxon could potentially refined this portion of the malathion risk assessment. Additional toxicity data on malaaxon may also be a help to EPA. EPA is also interested in information on typical storage conditions, or information on malathion's product life cycle, such as how long a product is typically stored before it is used."

Comments are due to EPA by November 22, 2005.

"After considering comments received, EPA will develop and issue the Malathion IRED. The decisions presented in this IRED may be supplemented by further risk mitigation measures when EPA considers its cumulative assessment of the organophosphate pesticides."

(See attached file: Malathion-REI-Tolerances-Reassessed.doc)(See attached file: Malathion-REIs-Tolerances-Reassessed.wpd)

Please do not hesitate to contact me if you have any questions or comments.

Best regards,

Teung

Soybean Rust Info
<http://www.usda.gov/soybeanrust/>

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