

Department of Pesticide Regulation (DPR)

Final Decision Concerning the Sulfuryl Fluoride (SF) Structural Fumigant Reevaluation

Pesticide Registration Evaluation Committee

July 19, 2013

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Post-Registration Continuous Evaluations

❑ **DPR Mission:** To protect human health and the environment by regulating pesticide sales and use, and by fostering reduced-risk pest management.

❑ **Pre-Registration Evaluation**

❑ Review & Evaluation

❑ **Post-Registration *Continuous Evaluation* activities**

- Exposure Monitoring
- Pesticide Use Reporting
- Food Safety Program
- Toxic Air Contaminant
- Environmental Monitoring Program
- Adverse Effects Reporting
- Pesticide Illness Surveillance Program
- **Reevaluation Program**

Reevaluation Program

❑ **Reevaluation Program** - Investigates all reports of actual or potential significant adverse effects to human health or the environment.

❑ **Reevaluation Triggers:**

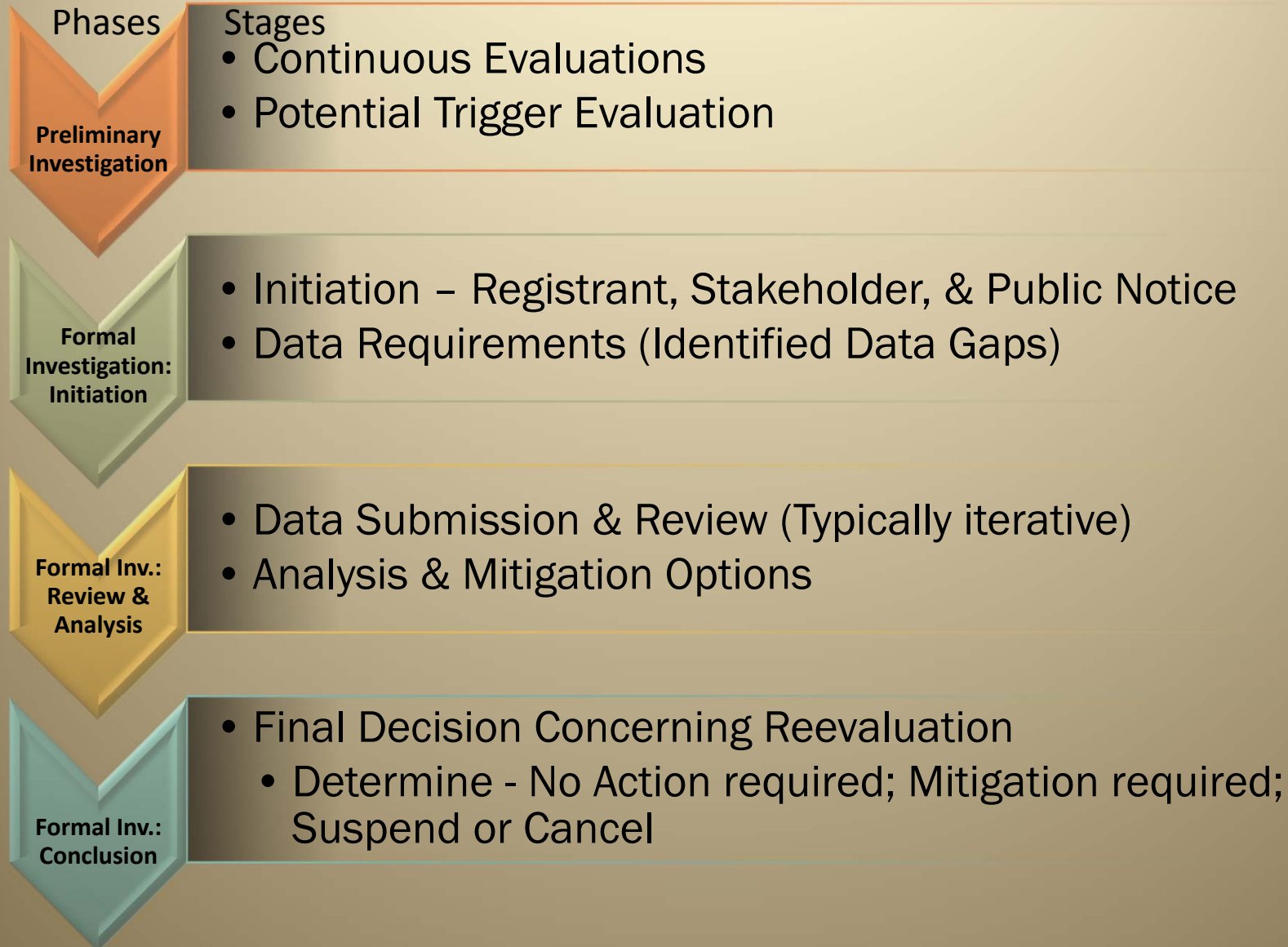
- Fish or Wildlife Hazard
- Inadequate Labeling
- Env. Contamination
- Public/ Worker Health Hazard
- Discovery that data relied upon is false, etc
- Other info. indicating significant Adverse Effect

❑ **Reevaluation Challenges:**

- Specific/Broad Focus or Scope
- Standard/ Non-standard Studies
- Changing Science, Technology, & Policy
- Few or Many Registrants/Products
- Varied Interest Groups
- Highly Iterative Process

Critical to this is the communication, coordination, management, and movement of each Reevaluation through the Reevaluation Process.

ReEvaluation Process Outline



Preliminary Investigation – Sulfuryl Fluoride

Continuous Evaluation: Internal investigation reveals potential Reevaluation issue/concern.

- **July 2006:** DPR completes its Risk Characterization Document (RCD)
 - DPR Scientist identified several scenarios where exposure to SF are of concern.
- **September 18, 2006:** DPR's Director proposed SF be placed on the Toxic Air Contaminant (TAC) list.
- **March 27, 2008:** DPR's WH&S Branch requested that DPR place SF Structural Fumigants into Reevaluation.
- **April 18, 2008:** Director approves the placement of SF Structural Fumigants into Reevaluation.

Formal Investigation: SF Initiation

- **CA Notice 2008-04:** On June 25, 2008 DPR commenced the Reevaluation of SF products intended for structural-use.
 - **Basis:** Public and Worker Health Hazard
 - **Registrant & Public Notification:** 3 Registrants; CA Notice
 - **Data Requirements:** Two data sets (table 1 and 2)

Table 1. **Fumigant worker exposure** monitoring data to SF for single dwelling units.

Type of data required	Stage of Structural Fumigation			Guideline reference
	Aeration	Untarping	Reentry	
Area air monitoring	Required	Required	Required	OPPTS 875.1300, 875.1400
Personal air monitoring	Required	Required	Required	OPPTS 875.1300, 875.1400

Table 2. **Residential post-application** monitoring data to SF for single dwelling units.

Type of data required	Maximum Application Rate	Guideline reference
Instantaneous air measurements	Required	OPPTS 875.2500
Continuous air measurements	Required	OPPTS 875.2500

Formal Investigation: SF Review & Analysis

Review & Analysis: SF entered an iterative process requiring further refinement, expansion, and additional data after reexamination.

- August 2008, DPR received compliance statements from all 3 registrants.
- Sept. 2008 to Sept. 2009, DPR received & reviewed data and protocols from Registrants.
- **Oct. 14, 2009:** Data Expansion; multiple dwelling units.
- **June 14, 2010:** Data Expansion; include monitoring for chloropicrin since a label requirement.

Formal Investigation: SF Review & Analysis

Revised Data Requirement Tables:

Table 1. Fumigant worker exposure monitoring data to **SF and chloropicrin** for **single and multiple-story multiple dwelling units**.

Type of data required	Stage of Structural Fumigation			Guideline reference
	Aeration	Untarping	Reentry	
Area air monitoring	Required	Required	Required	OPPTS 875.1300, 875.1400
Personal air monitoring	Required	Required	Required	OPPTS 875.1300, 875.1400

Table 2. Residential post-application monitoring data to **SF and chloropicrin** for **single and multiple-story, multiple dwelling units**.

Type of data required	Maximum Application Rate	Guideline reference
Instantaneous air measurements	Required	OPPTS 875.2500
Continuous air measurements	Required	OPPTS 875.2500

- From June 2010 to January 2013, DPR received & reviewed data and protocols from the Registrants.
- DPR's WH&S completed its reviews and evaluation memo's of the submitted studies and information.

Conclusion – SF Structural Fumigants

- **CA Notice 2013-03:** On March 13, 2013 DPR determined that no additional mitigation is needed and the SF Structural Fumigant Reevaluation to be concluded.
 - Mitigation controls & measures:
 - Structural Pest Control Industry developed a new structural aeration plan called the California Aeration Plan (CAP).
 - CAP currently in use by DPR. Further information can be found under DPR's Enforcement County Agricultural Commissioners Letters 2010-20 (CAP), 2011-16 (FAQ), and 2013-07 (Rev. CAP).
 - Conclusion: No additional mitigation needed; the CAP and the Revised CAP are acceptable to reduce potential exposures from SF structural fumigations.

Thank You. For additional information

Additional Reevaluation information can be found at:

- California Code of Regulations (Title 3, CCR Section 6220 to 6228),
- DPR's Guide to Pesticide Regulation (Ch.4),
- Reevaluation Web page, and
- Semiannual Report

Contact Information

For more information on this Reevaluation, the Reevaluation Program, or Process, please do not hesitate to contact me.

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