



Paul Helliker  
Director

# Department of Pesticide Regulation



Gray Davis  
Governor

Winston H. Hickox  
Secretary, California  
Environmental  
Protection Agency

## MEMORANDUM

TO: Tobi Jones, Assistant Director  
Division of Registration and  
Health Evaluation

FROM: Paul Gosselin  
Chief Deputy Director  
(916) 445-4330

DATE: September 17, 2002

SUBJECT: RISK MANAGEMENT DIRECTIVE - FIRST ADDENDUM TO THE  
NALED RISK CHARACTERIZATION DOCUMENT

In August 2001, staff completed an addendum to the Naled Risk Characterization Document (RCD). Staff identified some specific occupational practices that resulted in exposures below the optimal margin of safety of 100 for systemic and localized effects.

In light of the risks identified in the Naled RCD, I am directing you to initially undertake efforts to mitigate the unacceptable system effects. After reasonable steps are identified to mitigate systemic effects, you should evaluate the resultant local effects. In your deliberations you should also track the steps taken by the U.S. Environmental Protection Agency as a result of their completion of the Naled Reregistration Eligibility Document.

Finally, the timeframe for initiating mitigation measures for Naled must be prioritized behind existing projects.

