



Department of Pesticide Regulation



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MEMORANDUM

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TO: Ann Prichard, Sr. Environ. Research Scientist
Pesticide Registration Branch HSM-03009

VIA: Joseph P. Frank, Senior Toxicologist
Worker Health and Safety Branch

FROM: Michael H. Dong, Staff Toxicologist (Specialist) *[original signed by M. Dong]*
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DATE: April 25, 2003

SUBJECT: RESPONSE TO CLOROX' COMMENTS ON THE HYDRAMETHYLNON
RCD DRAFT

Below is the response to Clorox Services Company's specific concerns (received March 3, 2003; Tracking No. SBRA-199011-E) over the dermal absorption rate used in the hydramethylnon exposure assessment performed by the Worker Health and Safety Branch (WH&S). The exposure assessment document (EAD) is part of the hydramethylnon risk characterization document (RCD).

In essence, Clorox argued that the use of 5% of the applied dermal dose in the EAD as the dermal bioavailability appears to be overly conservative, as their absorption study using a gel formulation indicated a lower absorption rate of about 1 to 2%.

WH&S used a 5% absorption rate in its EAD because granular formulation for outdoor uses was the target. It is also explained in the EAD (p.6) that the use of a gel formulation in their study *might* underestimate the dermal absorption for the granular formulation. While the exposure assessor does not know for certain that this is indeed the case, the typical formulation used for a dermal absorption study acceptable for exposure assessment is the technical. Also of note is the fact that the EAD already concluded (p.5 & p.14) that the worker and children exposures are insignificant from using the hydramethylnon gel and bait products, due to the little or no direct dermal contact involved.

