



# Department of Pesticide Regulation



Mary-Ann Warmerdam  
Director

## MEMORANDUM

Arnold Schwarzenegger  
Governor

TO: Ann Prichard  
Chief, Pesticide Registration Branch

FROM: Susan Edmiston *[Original signed by S. Edmiston]*  
Chief, Worker Health and Safety Branch  
(916) 445-4278

DATE: June 3, 2010

SUBJECT: SULFURYL FLUORIDE AND CHLOROPICRIN MONITORING DURING  
STRUCTURAL FUMIGATION STUDIES

---

The Worker Health and Safety Branch (WH&S) maintains a database of pesticide-related illness reports (PISP). The PISP database contains numerous reports (and follow-up investigations) of illness following the use of sulfuryl fluoride and chloropicrin (as a warning agent) in structures. In addition, workers of Southern California utility companies have complained of eye and respiratory irritation symptoms when restarting gas service and pilot lights in structures fumigated with sulfuryl fluoride. Based on the circumstances of exposure and the symptoms experienced we suspect that many of the illnesses are due to chloropicrin exposure.

Sulfuryl fluoride product labels require the use of chloropicrin as a warning agent when fumigating homes. Chloropicrin is a toxic gas that causes eye and respiratory irritation at low levels. Pursuant to its reevaluation, DPR is requiring sulfuryl fluoride registrants to conduct monitoring studies in both one-story single family residences and multiple-story multiple dwelling residences. However, in identifying its data requirements, DPR neglected to specify that registrants must monitor for both sulfuryl fluoride and chloropicrin.

To fully protect residents, bystanders and utility workers, WH&S is requiring registrants to monitor for levels of sulfuryl fluoride and chloropicrin in fumigated structures. Please inform sulfuryl fluoride registrants with products included in DPR's reevaluation, that they must collect and submit data on chloropicrin levels in structures fumigated with sulfuryl fluoride.

All sulfuryl fluoride structural fumigation monitoring study protocols must include provisions for monitoring both sulfuryl fluoride and chloropicrin during aeration, untarping, and reentry for both one-story single family residences and multiple-story multiple dwelling units (i.e., condominiums, townhouses, apartment complexes).

