



DIRECTOR'S DECISION IN RESPONSE TO THE PESTICIDE REGISTRATION AND EVALUATION COMMITTEE'S SUBCOMMITTEE FINDINGS REGARDING THE DETECTION OF CHLOROTHAL-DIMETHYL DEGRADATION PRODUCTS IN GROUND WATER

Section 13150 of the Pesticide Contamination Prevention Act (Article 15, Chapter 2, Division 7 of the Food and Agricultural Code) requires the Department of Pesticide Regulation (DPR) Director to respond to the findings of the Pesticide Registration and Evaluation Committee subcommittee (PREC subcommittee) concerning the detection of chlorthal-dimethyl (DCPA) degradation products in ground water within 30 days of issuance. The PREC subcommittee transmitted its findings and recommendations, entitled "Implementation of the Pesticide Contamination and Prevention Act, Chlorthal-dimethyl (DCPA): Findings and Recommendations," to the Director on November 13, 2018.

After DPR detected concentrations of the chlorthal-dimethyl degradates—monomethyl tetrachloroterephthalate (MTP) and 2,3,5,6-tetrachloroterephthalic acid (TPA)—in California ground water, the PREC subcommittee held a public hearing on August 29, 2018 to determine if agricultural use of the pesticides could continue. At the August 29, 2018 public hearing, the PREC subcommittee unanimously found in accordance with paragraph (1) of subdivision (c) of Food and Agricultural Code section 13150 that MTP and TPA have not polluted and do not threaten to pollute the ground water of the state. The PREC subcommittee memorialized this finding in the document entitled, "Implementation of the Pesticide Contamination and Prevention Act, Chlorthal-dimethyl (DCPA): Findings and Recommendations." The PREC subcommittee found that all MTP and TPA levels detected in ground water fall considerably below the health-protective drinking water level of 2500 ppb derived by the Office of Environmental Health Hazard Assessment from the available toxicological information using established approaches. As a result, the PREC subcommittee concluded that MTP and TPA have not polluted ground water. In addition, the PREC subcommittee found that ground water modeling results do not indicate that MTP or TPA threaten to pollute the ground water of the state under current labeled use conditions. The PREC subcommittee recommended that DPR continue to monitor for both DCPA, MTP, and TPA in ground water to ensure that detections do not increase significantly in concentrations or frequency.

The Director reviewed and concurs with the PREC subcommittee finding that MTP and TPA have not polluted and do not threaten to pollute the ground water of the state, subject to DPR's continuous review of new science and data that may impact the validity of the PREC subcommittee's finding. The Director finds that the continued monitoring of MTP and TPA levels in ground water is an appropriate approach to protect against pollution of the ground waters of the state consistent with Food and Agricultural Code section 13152(a)(1).

