



Department of Pesticide Regulation



Brian R. Leahy
Director

MEMORANDUM

Edmund G. Brown Jr.
Governor

TO: Dr. Marylou Verder-Carlos
Assistant Director
Pesticide Programs Division

HSM-16014
(No. assigned after issuance of memo)

FROM: Lisa Ross, Ph.D.
Environmental Program Manager II
Chief, Worker Health and Safety Branch
(916) 324-4116

[Original signed by L. Ross]

DATE: June 27, 2016

SUBJECT: COMPLETION OF ETHOPROP MITIGATION

The memorandum entitled “Mitigation of Ethoprop Complete” (Sanders 1998) describes the findings of the Worker Health and Safety Branch (WHS) in regards to the need for mitigation of exposures to ethoprop, an organophosphate nematicide and insecticide. For your convenience, a copy of that memorandum is attached.

In 1995, DPR’s Risk Characterization Document (RCD) for ethoprop identified multiple exposure scenarios for ethoprop handlers for which Margins of Safety (now called Margins of Exposure) were less than 100 and/or cancer risks were greater than 10^{-6} . By 1998, the only scenarios of concern remaining were potential applications of ethoprop to greenhouse transplants of cucumber and cabbage. However, DPR’s Enforcement Branch determined that those potential applications were prohibited by restrictions on ethoprop product labeling (Sanders 1998).

In the intervening years, ethoprop use in California has declined dramatically (DPR 2016a). In 1995, the year of the RCD, reported use of ethoprop was 51,104 pounds of active ingredient statewide. Ten years later, in 2005, reported use had dropped to 18,924 pounds. In 2014, the most recent year for which use statistics are available, ethoprop use was only 1,228 pounds.

During the most recent 10 years for which illness statistics are available, 2004 through 2013, no illness or injury cases associated with ethoprop were reported to DPR’s Pesticide Illness Surveillance Program (DPR 2016b).

Given the label prohibitions against use on greenhouse transplants, the low and declining use in California, and the lack of reports of ethoprop-related illness, WHS finds that there is no need for further mitigation action for ethoprop. Your approval of this conclusion is requested.

cc: Kevin Solari, Environmental Program Manager I, WHS

APPROVAL

[Original signed by M. Verder-Carlos]
Marylou Verder-Carlos, Assistant Director

7/5/2016
Date

Dr. Marylou Verder-Carlos
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REFERENCES

- Cochran, R.C. 1995. *Ethoprop Risk Characterization Document*. California Department of Pesticide Regulation, California Environmental Protection Agency, Sacramento, CA. Available at: <http://www.cdpr.ca.gov/docs/risk/rcd/ethoprop.pdf> (accessed June 24, 2016).
- DPR (California Department of Pesticide Regulation). 2016a. *California Pesticide Information Portal (CALPIP), Pesticide Use Report Database*. California Department of Pesticide Regulation, California Environmental Protection Agency, Sacramento CA. Available at <http://calpip.cdpr.ca.gov/main.cfm> (accessed June 24, 2016).
- DPR (California Department of Pesticide Regulation). 2016b. *California Pesticide Illness Query (CalPIQ)* [Online]. California Department of Pesticide Regulation, California Environmental Protection Agency, Sacramento CA. Available at http://apps.cdpr.ca.gov/calpiq/calpiq_input.cfm (accessed June 24, 2016)
- Sanders, J.S. 1998. *Mitigation of Ethoprop Complete*. Memorandum to Gary Patterson dated December 22, 1998. California Department of Pesticide Regulation, California Environmental Protection Agency, Sacramento, CA.

Attachment: Copy of Sanders (1998).



Peter M. Rooney
Secretary for
Environmental
Protection

Department of Pesticide Regulation

James W. Wells, Director
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Pete Wilson
Governor

MEMORANDUM

TO: ✓ Gary Patterson, Chief
Medical Toxicology Branch

John H. Ross, Senior Toxicologist
Josh Johnson, Associate Pesticide Review Scientist
Worker Health and Safety Branch

FROM: John S. Sanders, Chief 
Worker Health and Safety Branch

DATE: December 22, 1998

SUBJECT: MITIGATION OF ETHOPROP COMPLETE

The Risk Characterization document (RCD) for ethoprop was completed in 1995. The RCD indicated that some use practices had unacceptable Margin of Exposures. The Department has been working to mitigate these practices since 1995.

The last use practice of concern that remained in 1998 was the use of ethoprop on greenhouse cucumber and cabbage transplants. I requested the Enforcement Branch to review the labels of products currently registered in California and determine if the label language allowed this particular use. Enforcement has determined that treating potting soil prior to filling the trays or treating trays after the trays are seeded would be a conflict with labeling. I have attached Enforcement's interpretation of the ethoprop (Mocap) labels currently registered in California.

Until use practices or labels change, the use practices of ethoprop have been mitigated and no further action is needed.



Peter M. Rooney
Secretary for
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Pete Wilson
Governor

MEMORANDUM

TO: John S. Sanders, Chief
Worker Health and Safety Branch

FROM: 
Charles M. Andrews, Chief
Pesticide Enforcement Branch
(916) 445-3852

DATE: December 15, 1998

SUBJECT: MOCAP LABEL INTERPRETATION

Staff reviewed the labels for Mocap 10% Granular, LockN Load, (EPA Registration No. 264-465-ZB), and Mocap 10% Granular, (Registration No. 264-465-AA) to determine whether these two product labels can be used to treat greenhouse cucumber and cabbage transplants.

The Greenhouse Transplant Industry uses plastic trays to produce transplant plugs. These trays are automatically filled with potting soil by a potting machine, seeded by a seeding machine, watered, and placed on greenhouse benches. The label use directions for both products do not give the use rate in pounds/cubic feet, prohibits seed contact with the pesticide due to phytotoxicity problems, and requires the pesticide to be incorporated into the soil. Treating potting soil prior to filling the trays or treating trays after the trays are seeded would be a conflict with labeling and a violation of Food and Agricultural code section 12973.

If you have any questions, please contact me.

cc: Lisa Quagliaroli
Vic Acosta