



Department of Pesticide Regulation

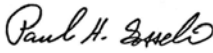


Mary-Ann Warmerdam
Director

MEMORANDUM

Arnold Schwarzenegger
Governor

TO: Doug Okumura
Assistant Director


FROM: Paul H. Gosselin
Chief Deputy Director
(916) 445-4000

DATE: June 8, 2005

SUBJECT: RISK MANAGEMENT DIRECTIVE FOR AZINPHOS-METHYL

On December 2, 2004, the Department of Pesticide Regulation (DPR) staff completed a revision to the risk characterization document on azinphos-methyl (AZM).

The following directive uses Reference Doses based on confirmatory human tests. Based on the assessment conducted by staff, and in light of the comments from peer review, we will base any regulation action on the need to limit acute and short-term exposures below 75 micrograms/kg; seasonal exposures below 25 micrograms/kg/day; and chronic exposures below 1.5 micrograms/kg/day.

Based on these regulatory exposure values, the revised risk characterization document for AZM concluded that the acute occupational risk for all agricultural workers were acceptable, except peach harvesters and thinners. There were unacceptable risks for short-term (repeated exposure) occupational exposure for airblast applicators and for peach harvesters and thinners. The U.S. Environmental Protection Agency (U.S. EPA) intends to terminate uses on many crops including nectarines and peaches, based on a memorandum of agreement (MOA) between the registrant and U.S. EPA. The termination of these uses was due to happen by December 31, 2005, but the registrants requested the termination at this time. In addition, the registrants requested waiving the 180-day comment period. According to the MOA, the uses of AZM on a list of other crops (including almonds, pistachios, walnuts, apples, pears, and cherries) are to be reevaluated by October 31 of this year. Therefore, I recommend we take the following steps:

1. Track the progress of U.S. EPA to terminate the AZM uses on nectarines and peaches as requested by the registrants as well as their reevaluation of the uses on apples, pears and other crops.
2. If U.S. EPA terminates some of the uses identified as posing a risk, then we will not need to prepare mitigation measures.
3. By January 2006, evaluate the progress of U.S. EPA and prepare appropriate mitigation measures for those remaining uses that pose an unacceptable risk.



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4. Meanwhile, we should communicate our concerns with U.S. EPA about the uses, not only on apples, pears, and oranges, but also possible future use trend on some crops that are listed on the label with very little or no uses in California at this time, such as grapes and cotton.

In regards to the ambient air risks posed by AZM as a toxic air contaminant, the acute, seasonal, and chronic risk in the ambient air are all greater than 1,000. Therefore, proceeding through the toxic air contaminant process would not be warranted.

cc: Tobi Jones