

APPENDIX F

Department of Pesticide Regulation Request to the Air Resource Board for Proposed Toxic Air Contaminants Monitoring for 2008



Department of Pesticide Regulation



Mary-Ann Warmerdam
Director

MEMORANDUM

Arnold Schwarzenegger
Governor

TO: James Goldstene
Executive Officer
Air Resources Board
1001 I Street
Sacramento, California 95814

FROM: Mary-Ann Warmerdam
Director
(916) 445-4000

Original signed by

DATE: January 4, 2008

SUBJECT: PROPOSED TOXIC AIR CONTAMINANT MONITORING FOR 2008

Pursuant to Food and Agricultural Code section 14022(c), the Department of Pesticide Regulation (DPR) requests that the Air Resources Board (ARB) monitor for the following pesticides in 2008:

- Dicofol
- Phosphine
- Propanil

DPR requests that ARB monitor one application site and conduct ambient monitoring for dicofol (2,2,2-trichloro-1,1-bis(4-chlorophenyl) ethanol). This organochlorine insecticide is used primarily on cotton and is high priority for risk assessment. DPR will provide recommendations for dates and locations of monitoring after evaluating recent pesticide use data. Similar to DDT, the technical dicofol used in the formulated product is a mixture of two isomers--approximately 80 percent p,p'-dicofol and approximately 20 percent o,p'-dicofol. The sampling and analysis should account for both isomers, either separately or combined. In addition, ARB should investigate the possibility of including the following breakdown products in the monitoring:

- 2,2-dichloro-1,1-bis(4-chlorophenyl) ethanol (p,p'-FW-152)
- 4,4'-dichlorobenzophenone (p,p'-DCBP)

DPR requests that ARB monitor one application site for phosphine because it has moderate pesticidal use, high volatility, and high priority for risk assessment. Phosphine gas is registered as an active ingredient, but more commonly it is applied as an inorganic phosphide (e.g. aluminum phosphide, magnesium phosphide). All phosphine compounds are used primarily as a postharvest commodity fumigant in chambers or other enclosures. As a commodity fumigant, source (as well as offsite) monitoring may be needed.



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DPR requests that ARB monitor one application site and conduct ambient monitoring for propanil. This herbicide is used almost exclusively on rice and is high priority for risk assessment. DPR will provide recommendations for dates and locations of monitoring after evaluating recent pesticide use data. In addition, ARB should investigate the possibility of including the breakdown product 3,4-dichloroaniline in the monitoring.

Based on a preliminary assessment of the toxicology data, DPR requests the following target quantitation limits:

- Dicofol and breakdown products 0.2 $\mu\text{g}/\text{m}^3$
- Propanil and breakdown product 1.0 $\mu\text{g}/\text{m}^3$
- Phosphine 1.0 $\mu\text{g}/\text{m}^3$

Thank you for your consideration of this request. If you have any questions, please feel free to contact Dr. John S. Sanders, of my staff, at (916) 324-4155, or <jsanders@cdpr.ca.gov>.

cc: Dr. Joan E. Denton, Director, Office of Environmental Health Hazard Assessment
Bill Loscutoff, ARB Division Chief
Dr. John S. Sanders