



Mary-Ann Warmerdam
Director

Arnold Schwarzenegger
Governor

California Notice 2008-04

POST UNTIL July 27, 2008

**NOTICE OF DECISION TO INITIATE REEVALUATION
OF CERTAIN SULFURYL FLUORIDE PRODUCTS INTENDED FOR STRUCTURAL
FUMIGATION**

Pursuant to Article 8, Subchapter 1, Chapter 2, Division 6 of Title 3 of the California Code of Regulation, the Director of the Department of Pesticide Regulation (DPR) notices her decision to initiate a reevaluation of certain pesticide products intended for structural fumigation and containing the active ingredient sulfuryl fluoride. Interested persons may comment on this decision up to and including the date shown on the top-right corner of this notice to the Department of Pesticide Regulation, Pesticide Registration Branch, 1001 I Street, P.O. Box 4015, Sacramento, California 95812-4015.

REEVALUATION

DPR is hereby commencing a reevaluation of the pesticide products listed below. This reevaluation involves three registrants and three pesticide products.

Registrant	Brand Name, U.S. EPA Reg. No.
Dow Agrosciences LLC	Vikane, EPA Reg. No. 62719-4-ZA
Ensystex II, Inc.	Zythor, EPA Reg. No. 81824-1-AA
Drexel Chemical Company	Drexel Master Fume, EPA Reg. No. 19713-596-AA

BASIS OF REEVALUATION

In July 2006, DPR completed a risk assessment on inhalation exposure to sulfuryl fluoride as used in structural fumigation. In the risk characterization document (RCD), DPR scientists identified several scenarios where exposure to sulfuryl fluoride is of concern. DPR based the exposure assessment for these scenarios on limited data, using health-protective factors to compensate for data uncertainties. Based on the current exposure assessment, it appears that worker, bystander, and residential exposure cannot be mitigated using currently known mitigation strategies.

DPR is also concerned that current sulfuryl fluoride labels in combination with California regulations require workers to use self-contained breathing apparatus (SCBA) until air levels are confirmed to be below 1 part per million (ppm). DPR and the structural pest control industry developed a tarpaulin removal aeration plan (TRAP), based on the need to reduce worker exposure to 5 ppm (the standard on older labels). DPR is concerned that workers removing tarpaulins using the TRAP method may be exposed to sulfuryl fluoride levels above the permissible reentry level of 1 ppm, thereby, triggering the requirement to wear SCBA. While SCBA protects the worker from possible residues, DPR feels that it obstructs vision and can be



hazardous to personnel working at heights, such as rooftops. DPR needs data to assess whether the TRAP plan is adequate to reduce sulfuryl fluoride exposures to workers to 1 ppm (the current label standard). In addition, DPR needs monitoring data to develop mitigation methods that will reduce the risks to workers, bystanders, and residents.

Pursuant to this reevaluation, registrants with sulfuryl fluoride pesticide products registered for structural use are required to provide the following data to DPR:

- Worker exposure monitoring data, including aeration, untarping and reentry of structures treated at maximum label rates.
- Residential post-application monitoring, including both instantaneous and continuous air measurements, until measurements are below the level of detection.

For information regarding the reevaluation process, please contact Ms. Denise Webster, Program Specialist, Pesticide Registration Branch, by e-mail at <dwebster@cdpr.ca.gov> or by telephone at (916) 324-3522.

Original signed by

Ann Prichard, Acting Branch Chief
Pesticide Registration Branch
(916) 324-3931

June 25, 2008

Date

cc: Ms. Denise Webster, Program Specialist
Ms. Linda O'Connell, Senior Environmental Scientist
Ms. Anne Downs, Program Specialist