September 2, 1999

MEMORANDUM

SUBJECT: Response to Public Comments on the Preliminary Risk Assessment for the Organophosphate Phorate

FROM: Ben Chambliss, Chemical Review Manager
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TO: OPP Public Docket for Phorate
Docket #34137

Introduction

This document addresses public comments that were received in response to EPA's Notice of Availability (63 FR 43175, August 12, 1998) of preliminary risk assessments for the first nine organophosphate chemicals: azinphos-methyl; bensulide; ethion; fenamiphos; isofenphos; naled; phorate; profenofos; and terbufos. Part I of this document addresses comments specific to Phorate, and Part II focuses on non-chemical-specific comments. By "non-chemical-specific" we mean that the comment was submitted to the OPP Public Dockets for each of the nine chemicals or for a significant sub-set of the nine. Also, these non-chemical-specific comments generally apply to regulatory or science policy issues that are not unique to any one of the risk assessments. A few of the public comments received were specific to phorate. EPA's responses to these chemical-specific comments will be placed in the Public Docket at the same time as the revised risk assessment.

Part I: Phorate Specific Comments and Responses

In response to the notice, a total of 24 comments were submitted to the phorate docket. The comments were from private citizens, trade groups/associations, nongoverment environmental organizations, and American Cyanamid Company. American Cyanamid holds the

registration for the active ingredient phorate. Five of the 24 comments were considered specific to phorate (see docket # 34137 entries 38, 41, 42, 44, 45). Of the five comments considered specific to phorate, four were submitted by American Cyanamid (docket entries 41, 42, 44, 45) and are discussed in Part I sub-sections A and B. The fifth phorate specific comment (docket entry 38) was submitted by the Northwest Potato Crop Protection Coalition and is discussed below.

Comments: The Northwest Potato Crop Coalition comments were testimonial in nature expressing their opinion relative to the benefits, safety and low dietary risk of phorate use on potatoes.

Response: Although the comments require no Agency response, EPA recognizes the views exhibited and will take this information into account during the risk management phase.

A. Response to Comments on the HED Chapter

Comments: In general American Cyanamid's comments included responses to outstanding data cited in the HED chapter and included time lines for submitting the additional data. American Cyanamid also speculated on the impact of these data on the risk assessments. Cyanamid indicated they intended to submit an acute neurotoxicity study, a new acute Monte Carlo dietary exposure estimate, a 28 day dermal toxicity study, a worker exposure study involving the active ingredient terbufos which could be used to estimate exposure for phorate, and a subchronic neurotoxicity study. The time period for submitting these studies was November 1998 and June 1999. The registrant contended that incorporation of the findings of these study could significantly improve the dietary and worker risk estimates, which according to the preliminary risk assessment were of concern for most populations and worker groups.

Response: EPA received and reviewed the new Monte Carlo Analysis and the acute neurotoxicity data in December 1998. This new information resulted in the establishment of a new acute dietary endpoint and acute dietary risk below the Agency level of concern for all sub-populations. The dermal toxicity study and worker exposure data were submitted to EPA in March 1999 and the results have been incorporated into the revised occupational risk assessment. Worker risk is now below the Agency's level of concern for most workers. The subchronic neurotoxicity data was submitted in August 1999. Upon review of this study, the FQPA safety factor decision will be revisited.

B. Response to Comments on the EFED Chapter

Comments: For the EFED chapter, the comments were in response to the outstanding data cited in the chapter. American Cyanamid indicated that they intend to submit additional soil mobility/solubility data and hydrolysis data for phorate and its degradates sulfoxide and sulfone in April 1999.

Response: American Cyanamid submitted these studies in June 1999. The results of the studies have been considered in the revised EFED chapter.

Part II: Non-Chemical-Specific Comments and Responses

Non-Chemical-Specific Comments and Responses

Non-chemical-specific comments were received from: American Crop Protection Association; Idaho Farm Bureau Federation; National Coalition Against the Misuse of Pesticides (NCAMP); National Cotton Council; Learning Disabilities Association; Fish and Wildlife Service, Division of Environmental Contaminants; Texas Agricultural Extension Service; Natural Resources Defense Council (NRDC); the Grocery Manufacturers of America, Michigan Agricultural Cooperative Marketing Association; U.S. Apple Association; Southern Professional Fruit Workers Conference (held at Clemson University); and 16 individuals, 13 of whom identified themselves as pest control operators (PCOs) or otherwise associated with the professional pest control industry.

To see a complete description of these comments and the Agency's responses, please refer to Part II (entitled Non-Chemical Specific Comments and Responses) of the comment response memo for the organophosphate bensulide. This document is located in the Public Docket #34132 and on the Internet at: http://www.epa.gov/pesticides/op/bensulide/reponse.pdf.