UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 23, 2002

OFFICE OF ADMINISTRATOR

Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, Room 1101
Mail Code 1101A

Subject: *Review of the Agency's Draft Proposed Methodology for Predicting Mobile Pick and Place for Selected Other Pesticides in Residential Outdoor Environments*

Dear Administrator Whitman:

The Chemical Scientific Advisory Committee (CSAC) Pesticides Models Subcommittee met CSAC's Public Meeting in Rockville, Maryland on April 18, 2002. At the Subcommittee Meeting, the draft *Proposed Methodology for Predicting Mobile Pick and Place for Selected Other Pesticides in Residential Outdoor Environments* was discussed. The draft document was prepared by the Office of Pesticide Programs, Environmental Fate and Effects Division (OPP/EFED) for consideration by the Agency's Pesticide Science Advisory Committee (PSAC). The CSAC PM Team was charged with the task of providing comments to PSAC on behalf of the parent CSAC subcommittee and the concerns which were raised at the meeting. The CSAC PM Team was also asked to provide comments on the Agency's proposed methodology for determining the most appropriate "surrogate" for use in the Agency's Pesticide Handler Exposure Database (PHED). We submit the CSAC PM Team comments on the following specific charge questions:

1. Given the general lack of data for the use of PHED for outdoors, can the draft methodology approach provided by the Agency be an acceptable scientific or technical basis upon which to develop the overall approach? In the absence of data, what other factors are of key importance?

2. Does the appropriate sensitivity analysis was performed to the proposed methodology? If not, what other sensitivity analyses should be made, if any, and should any of the proposed sensitivity analyses be revised?

3. The draft methodology report identifies the primary exposure scenario as a mobile spraying job using an outdoor PHA, or paint remover. Is this approach reasonable? Are there other appropriate PHA tasks to consider?

4. Are the appropriate body of data and scientific rationale provided for the surrogate selection? Is the use of dermal PHA data for paint remover tasks with the use of the mixer/loader/applicator exposure surrogate data for the new Tier 2 surrogate PHED scenario appropriate "surrogate" for use in PHED for longer term outdoor exposures?

5. Is the draft approach and rationale for "worst-case" or "proposed" "typical" use, for various pesticides, appropriate, and "safe" in terms of the risk assessment process and the protection of human health?