



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 14, 2008

MEMORANDUM

SUBJECT: Sulfometuron Methyl: Phase 3: Response to Public Comments.

PC Code: 122001	DP Barcode: 346172
MRID No.: N/A	Registration No.: N/A
Petition No.: N/A	Regulatory Action: Phase 3
Risk Assessment Type: Response to Public Comments	Case No.: 3136
TXR No.: N/A	CAS No.: 74222-97-2
MRID No.: N/A	40 CFR: N/A (Non-Food/ Non-Feed)

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This document serves as the Health Effects Division's (HED) response to public comments in reference to the December 20, 2007 document, "Sulfometuron Methyl: HED Chapter of the Reregistration Eligibility Decision Document (RED)" (W. Britton, D346064). The only comments submitted were by the National Council for Air and Stream Improvement (NCASI). The following comment pertains to HED's contribution to the RED:

- "the occupational handler risk assessment finds that excess risks are associated with the exposure scenario of mixing/loading WDGs for aerial application to forestry and non-crop areas, even with the use of additional PPE. The risk

assessment correctly notes that concern associated with this finding is “significantly reduced,” based on the number of conservative assumptions used in the assessment, such as the assumption of 100% dermal absorption. This risk assessment might be strengthened by the inclusion of a dermal exposure assessment using structure-activity relationships to predict the permeability coefficient of sulfometuron as described in EPA/600/8-91/011B. This approach was used in the development of the USDA Forest Service Human Health and Ecological Risk Assessment for Sulfometuron Methyl.”

HED concurs with NCASI that the risk assessment may be strengthened by the inclusion of a dermal assessment based upon a quantitative structure-activity relationships (as employed by USDA); however, HED has determined that an assumption of 100% dermal absorption is the most conservative approach and, therefore, protective of human health. The following was included as a part of the 12/2007 Sulfometuron RED document which provides characterization of the determined approach: “Dermal risks, which drive handler risks, were calculated assuming 100% dermal absorption due to lack of acceptable dermal absorption data. Assuming even a slightly lower dermal absorption of 90%, which is still likely to exceed the actual dermal absorption, would result in risk estimates which are not of concern for all scenarios, assuming some level of personal protective equipment is employed.” Ultimately, a refinement of dermal absorption would not significantly impact current high-end estimates of occupational handler risk.