

Non-Dietary Exposure

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Non-Dietary Exposure

- Assess applicator and post application exposure to pesticides
 - Establish Personal Protective Equipment (PPE) for applicators
 - Establish reentry intervals (including Restricted Entry Intervals (REI))



Subpart U, Applicator Exposure

- Dermal and inhalation exposure data are now required based on toxicity and exposure criteria
 - To address Occupational and Residential Uses
 - Provide exposure calculations

- Biological monitoring is conditionally required
 - Provided human pharmacokinetics data are available



Subpart U, Applicator Exposure

- Product use information
 - Clarification of product label information
 - Duration of exposure
 - Number of applications and timing

Can include survey information



Subpart K, Post application

- Expanded to include greenhouse, forestry and other non-agricultural sites
- Expanded to include residential post application exposures
 - Turf, indoor uses and pets
- Indoor surface residues
 - Carpets and hard surfaces
- Non-dietary ingestion
 - Frequency of hand-to-mouth events and transfer efficiency



Subpart K, Post application

- Data reporting and calculations
- Product use information
 - Label clarification, identification of major uses and exposures
- Biological monitoring
 - Conditional



Subpart K – Post-application Exposure

Current requirement

Proposed requirement

Change

321-1	Foliar dissipation	875.2100	Dislodgeable foliar residue dissipation and turf transferable residues	Revised testing criteria. Expanded use sites to include testing for green-houses, nurseries, forests, residential settings, and turf grass. Changed from CR to R.
132-2	Soil dissipation	875.2200	Soil residue dissipation	Revised testing criteria. Expanded use sites to include testing for green-houses, nurseries, forests, and residential (CR) settings.
	None	875.2300	Indoor surface residue dissipation	Proposed requirement. Subject to revised testing criteria.
133-3	Dermal exposure	875.2400	Dermal exposure	Revised testing criteria. Expanded use sites to include testing for greenhouses, nurseries, forests, residential settings, and turf grass. Changed from CR to R.
133-4	Inhalation exposure	875.2500	Inhalation exposure	Revised testing criteria. Expanded use sites to include testing for greenhouses, nurseries, forests, residential settings, golf courses, and certain indoor environments. Changed from CR to R.



Subpart K – Post-application Exposure

Current requirement

Proposed requirement

Change

	None	875.2600	Biological monitoring	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.2700	Product use information	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.2800	Description of human activity	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.2900	Data reporting and calculations	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.3000	Nondietary ingestion exposure	Proposed requirement for residential uses. Not required for occupational uses. Subject to revised testing criteria.



Subpart U – Applicator Exposure

Current requirement

Proposed requirement

Change

	None	875.1100 875.1600	Dermal outdoor exposure	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.1200 875.1600	Dermal indoor exposure	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.1300 875.1600	Inhalation outdoor exposure	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.1400 875.1600	Inhalation indoor exposure	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.1500 875.1600	Biological monitoring	Proposed conditional requirement. Subject to revised testing criteria.
	None	875.1600	Data reporting and calculations	Proposed requirement. Subject to new testing criteria.
	None	875.1700	Product use information	Proposed requirement. Subject to new testing criteria.