449722-00

Outdoor Residential Task Force, L.L.C.
Paula F. Paul Chair, Administrative Committee

November 12, 1999

Lois Rossi
Director, Special Review and Reregistration Division
Environmental Protection Agency
Office of Pesticides, Prevention and Toxic Substances (H7508W)
401 M Street, SW
Washington, DC 20460

RE: First Data Submission from the Outdoor Residential Task Force (Company Number #71754) in Compliance with the Outdoor Residential DCI, March 3, 1995

Dear Ms Rossi:

Enclosed is the first submission of the Outdoor Residential Task Force. It is comprised of 17 volumes and 8 Studies that address the requirements of the DCI. Three copies of each volume are enclosed as required by EPA procedures. Also please note two videotapes which we have included. These tapes provide more information of the techniques used in the submitted studies.

The Outdoor Residential Exposure Task Force, L.L.C. is a limited liability company of registrants of turf pesticides that have come together to share the cost and effort of developing data to characterize human exposure to pesticides used on residential turf and ornamentals. This first submission contains data that address the following points (guidelines 231,232 and 133).

1. Exposure of Professional and Homeowner to pesticides during mixing and application to turf. This portion contains exposure studies and the associated method validation and field recovery data.
2. Exposure of Homeowners to pesticides during application to garden vegetables and ornamentals (by purchase of Rhone-Polenc data).
3. Survey data on outdoor residential pesticide use and usage which is an essential element in the assessment of applicator and reentry exposure to treated residential turf.
4. Research documenting the best available methodology for obtaining turf transferable residue data.

This submission also includes two videotapes made during the applicator studies and demonstrating the dislodgable residue sampling techniques in turf. These videos are for use by the Agency to familiarize reviewers with the techniques used in our studies.

The administrative materials volume (Volume 1) contains:

1. **A list of current ORETF member companies**. This list should be provided to the Registration Division and scientific review divisions or posted on the internal web site to inform EPA employees of which applicants and registrants may legally refer to the task force data. Non members who wish or need to use these data must either join the task force or submit a valid offer to pay to the ORETF. This list is updated and sent to the Agency on a regular basis.
2. **The list of active ingredients covered by the Outdoor Residential DCI and any additional active ingredients registered since March 1995 that are subject to the data call in**. The ORETF should be listed as a data submitter on the data submitters list for all of the active ingredients indicated.

Based upon our discussions and agreements on data protection prior to submission of the Ag Reentry Task Force (ARTF) scope study data, we have the following expectations regarding how the ORETF data will be handled by the Agency.

We expect that the Agency will assign a single MRID to the MLA integrated report. This report and the associated method validation reports would need to be cited by non-task force members seeking to use Task Force data to support new or maintaining existing registrations for homeowner or professional turf products. Any product registered or any application for registration should be subject to the requirements of the Outdoor Residential DCI.

The Use and Usage Survey will be a separate study that could also be cited by a non-member with the appropriate letter to the task force offering to pay compensation. We anticipate that this report will be necessary for any FQPA assessment that requires an outdoor residential component as well as for most risk assessments conducted to support registration.

The transferable turf methodology study is the basis for all of the company compound and formulation specific TTR studies that are being generated by task force member companies. This study could be cited as part of the protocol development for these company specific studies and for any subsequent work that may be done by the task force.

We would appreciate receiving the time schedule for review of the enclosed data so that we may keep our task force members informed.

Sincerely,

Paula Paul

Paula F. Paul
Chair ORETF Administrative Committee

Transmittal Document

1. **Name and address of Data Submitter:** Outdoor Residential Exposure ~~Agricultural Reentry~~ Task Force
C/o Harold Himmelman,
primary contact for data
compensation matters

Beveridge and Diamond, P.C.
1350 I Street, NW
Washington, DC 20005

2. **Regulatory Action in support of which this package is submitted:** Response to the *Outdoor Residential Exposure Data Call in Dated: March 3, 1995.*

3. **Transmittal Date:** November 12, 1999

4. **List of submitted studies:**

Volume 1: Administrative Materials: Copy of cover letters, list of current ORETF member companies, list of active ingredients covered by the Outdoor residential DCI and active ingredients registered after issuance of the DCI which are subject to the requirements.

44972201 **Volumes 2-7:** Integrated Report for Evaluation of Potential Exposures to Homeowners and Professional Lawn Care Operators Mixing, Loading and Applying Granular and Liquid Pesticides to Residential Lawns. October 10, 1999. (EPA Guideline 231-232)

44972202 **Volumes 8-9:** Outdoor Residential Pesticide Use and Usage Survey and National Gardening Association Survey. October 7, 1999. Stewart Ag Research, Inc., Doane Marketing Research, Inc. and the National Gardening Association. (Special Study to aid evaluation under the Food Quality Protection Act)

44972203 **Volumes 10-11:** Evaluation of Transferable Turf Residue Techniques: Evaluation Study of Transferable Residue Techniques (OMD001) and Transferable Residue Technique Modification Study: An Evaluation of Three Turf Sampling Techniques (OMD002). October 7, 1999. Monsanto Integrative Technologies and ABC Laboratories. (EPA Guideline 132-1(a))

44972204 **Volumes 12-13**: Validation of Methods for the Analysis of Worker Exposure and Reentry Matrices for Diazinon and Malathion (ARF003). February 23, 1999. ABC Laboratories Inc. (EPA Guideline 231)

44972205 **Volume 14:** Determination of the Field Recovery and Stability of Diazinon and Malathion for Use in ARTF (and ORETF) Reentry Exposure Studies (ARF006). April 28, 1999. ABC Laboratories, Inc. (EPA Guideline 231)

44972206 **Volume 15**: Characterization of Dacthal (DCPA) Formulations Used in studies conducted by the ORETF, including the Mixer, Loader Applicator Study (OTC001). October 9, 1996. Analytical Services, Ricerca Inc. (EPA Guideline 231 and 232)

44972207 **Volume 16:** Validation of Methods for Analysis of Worker Exposure and Reentry Matrices for Dacthal (OMV001). March 14, 1997. Ricerca Inc. Department of Residue analysis. (EPA Guideline 231 and 232)

REJECT(17) **Volume 17**: Determination of the Freezer Storage Stability of Diazinon and Malathion on Matrices Used in Field Exposure Studies (ARF007). October 8, 1999. ABC Laboratories, Inc. (EPA Guideline 231 and 232)