



AMERICAN ASSOCIATION OF OCCUPATIONAL HEALTH NURSES, INC.

Richard J. Kowalski, RN, MSA, COHN-S
PRESIDENT

Ann R. Cox, CAE
EXECUTIVE DIRECTOR

October 20, 2008

Office of Pesticide Programs (OPP)
Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Comments on Docket 7502P to revoke all tolerances established for Endosulfan

The American Association of Occupational Health Nurses, Inc. (AAOHN) is the national association representing the specialty practice of occupational and environmental health nursing, which provides for and delivers health and safety programs and services to workers, worker populations and community groups. Therefore, AAOHN is responding to the Environmental Protection Agency (EPA) on the agricultural use of the organochlorine pesticide endosulfan.

Pesticides are formulated to either kill an organism or hinder its reproduction, e.g., endosulfan. As a persistent, bioaccumulative, broad-spectrum pesticide for use on a wide variety of agricultural products and eventually entering waterways near application sites, the toxicology of endosulfan has demonstrated exposures and risks primarily to the nervous system and the reproductive system. The neurodevelopment implications of exposure to endosulfan are a significant concern despite the fact that additional research is needed. Even with the use of personal protective equipment and engineering controls, the exposure to agricultural workers has demonstrated short-and intermediate-term risks. Endosulfan has also shown an appreciable lipophilicity, therefore, a potential for bioaccumulation in the fatty tissues of food sources.

As the primary health care provider in the work environment, occupational and environmental health nurses (OHNs) are interested in the health and safety of workers and worker populations (farm workers, especially migrant workers), who are at a high risk of exposure; communities (families and children) living and/or working near exposure sites; and consumers of food products exposed to endosulfan. OHNs, as should EPA, look at several factors when dealing with toxins in the work environment; these include but are not limited to the following:

- The major exposure routes: inhalation, dermal and ingestion;
- The nature of the toxin's effect, i.e. latency periods after exposure;
- The fate of the toxin in the body, i.e., if and how the body eliminates the toxin and factors affecting elimination; and
- The endogenous and exogenous factors, i.e., beyond individual control or within some control of behavior or environmental control.

Although sampling of commodities may find "no residues or residues but no violation" (40 CRF 180.182), it is the unknown as well as the accumulative affects of endosulfan in the environment

(foods, water, etc.) and the body that concerns AAOHN. Therefore, AAOHN recommends banning the use and revocation of all tolerances for residues of endosulfan established under section 408 of the Federal Food, Drug and Cosmetic Act (FFDCA).

AAOHN appreciates the opportunity to have provided comments to the EPA on the toxin endosulfan. We would welcome the opportunity to work with the Administration in the future.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Kowalski". The signature is written in a cursive style with a large initial 'R' and 'K'.

Richard J. Kowalski, RN, MSA, COHN-S
President

CC: AAOHN Board of Directors
Ann Cox, Executive Director