



February 10, 2023

Julie Henderson, Director  
Karen Morrison, Deputy Director  
JT Teerlink, Assistant Director of Registration, Evaluation, and Human Health  
California Department of Pesticide Regulation

Via email: [Julie.henderson@cdpr.ca.gov](mailto:Julie.henderson@cdpr.ca.gov), [karen.morrison@cdpr.ca.gov](mailto:karen.morrison@cdpr.ca.gov),  
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**Re: Carcinogenicity study for chloropicrin should be shared fully and expeditiously with OEHHA**

Dear Director Henderson, Dr. Morrison and Dr. Teerlink,

As we discussed in the environmental justice meeting on January 23<sup>rd</sup>, we are glad to learn that, at long last, the Department recently received the chloropicrin carcinogenicity mechanistic study titled, *Identification of mouse lung target cell type and target respiratory region for effects following nose-only inhalation exposure to chloropicrin vapor* from the Chloropicrin Manufacturers Task Force. In 2015 (more than 7 years ago) the Chloropicrin Manufacturers were required to conduct this study "to obtain more information on the potential carcinogenicity of chloropicrin."

Chloropicrin remains among the highest use pesticides in California with use concentrated in central and southern coastal counties and in 2020, 77% of total use was in strawberry production. As reported recently to the Pesticide Regulatory Evaluation Committee (PREC), in 2021 the sub-chronic screening level was exceeded at the Oxnard Monitoring Network (AMN) site and reached 27% and 28% at the Santa Maria and Watsonville AMN sites. In Cal Enviro Screen 4.0, chloropicrin is ranked #2 for hazard and volatility among pesticides, after 1,3-dichloropropene (1,3-D), with which it is frequently used in combination.<sup>1</sup>


As you know, OEHHA scientists have conducted extensive review of chloropicrin toxicology in the past and have most recently expressed concern about ongoing exposure to chloropicrin resulting

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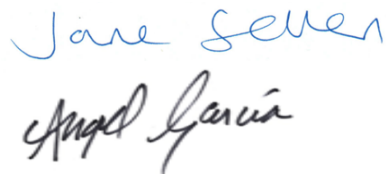
<sup>1</sup> <https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf#page=79>  
(Utilizes pesticide use data for 2017-2019)

from application of soil fumigation products that contain both 1,3 D and chloropicrin. We urge you to send the complete study to OEHHA for review without further delay in order to take full advantage of the breadth of expertise within Cal EPA to evaluate the findings of this study as comprehensively and promptly as possible. Please respond at your earliest convenience with your plan for sharing the full study with OEHHA.

Sincerely,



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