

Exponent

February 25, 1999

Dr. Joel A. Seckar, Ph.D.
R.J. Reynolds
Scientific & Regulatory Affairs
Bowman Technical Center
950 Reynolds Boulevard
Winston-Salem, North Carolina 27105

Exponent
15375 SE 30th Place
Suite 250
Bellevue, WA 98007

telephone 425-643-9803
facsimile 425-643-9827
www.exponent.com

Subject: Review of EPA's Proposed Phosphine Rule
Exponent Proposal 8601265.P01

Dear Dr. Seckar:

Thank you for your interest in Exponent's qualifications related to providing comments on the proposed U.S. Environmental Protection Agency (EPA) Reregistration Eligibility Decision (RED) regarding the use of aluminum/magnesium phosphide fumigants. It is our understanding that the Industrial Coalition for Phosphine Fumigants is interested in commenting on the technical and practical implementation of the RED, which if implemented will drastically affect the use of phosphide fumigants. Of particular interest to the Coalition is the appropriateness of the airborne concentration of 0.03 ppm that is proposed in the RED.

Exponent is a multidisciplinary technical consulting firm employing nearly 600 staff, including scientists, engineers, physicians, and business consultants. Our multidisciplinary teams perform in-depth scientific investigations and analyses to help clients understand why and how events happen, what the long-term and short-term effects of those events may be, and what actions are necessary to produce favorable outcomes. I have enclosed a copy of our corporate brochure, which provides more details on our specific service areas.

Exponent's toxicology staff has extensive experience conducting human health risk assessments and responding to proposed state and federal regulations. Our toxicology staff, their educational backgrounds, and their areas of expertise are listed on Table 1. For this project, we have identified Drs. Dennis Paustenbach, Brent Finley, and Patrick Sheehan and Ms. Renee Kalmes as key personnel. Their particular experience in the areas of reviewing and commenting on proposed regulations, conducting technical presentations, and assessing pesticide and fumigant health effects are listed in Table 2. I have also enclosed resumes for these individuals and a labor rate for Exponent staff for your review.

I hope you find this information useful. We look forward to working with you on this important project. If you have any questions or would like further information, please do not hesitate to call me at (650) 688-1757.

Sincerely,



Renee Kalmes C.I.H.
Managing Scientist
Environmental Group

Enclosures