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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Dursban (Chlorpyrifos) protocol for use in food handling establishments

FROM: Andrew Rathman, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO: Jay Ellenberger, Product Manager #12  
Insecticide-Rodenticide Branch  
Registration Division (TS-767)

Our previous review of this protocol (3/15/83) noted the need for information as to the sites where the product would be used.

We now have a memo of a telephone conversation between Mr. D. Edwards (PM#12 team) and Insectia Paint Co. giving us the following site information:

"Application within food handling establishments (places in which food is held, processed, prepared or served) including but not limited to Restaurants, Grocery Stores, Bakeries, Bottling Plants, Canneries and Grain Mills. Also included would be barns, milk rooms, warehouses and possibly other sites where food could be stored or transported."

The protocol as written would test for residues in milk (simulating milk house exposure), beef tissue (simulating meat processing) and apples and potatoes.

Considering the diversity of the sites, we do not believe the planned test will be adequate.

Barns, and other places where livestock and poultry are housed, should be removed from consideration or tests designed for those types of operations should be concluded. In addition to the foods listed for testing, we will also need foods tested that will reflect use in restaurants, bakeries, warehouse and more foods that may be present as unwrapped produce in grocery stores. We suggest the following foods:

- 1) Typical restaurant meals
- 2) Individual butter pats
- 3) Rolls (not packaged)
- 4) Packaged foods typical to long term warehouse storage
- 5) Leafy vegetables
- 6) Sliced lunch meat and cheese

The above foods should be exposed for periods reasonably reflecting actual practice. Additionally, as noted in the 3/15/83 review if air samples show a constant level of insecticide over the testing period, we may require additional air samplings over a longer (than 8 week) period.

cc: Circu, R.F., Chlorpyrifos, R.F., Rathman,  
TS-769:RCB:Reviewr:ARRathman:LDT:557-7324:CM#2:RM:810:Date:3/31/83

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