

US EPA ARCHIVE DOCUMENT



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

MAR 6 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: NO ACCESSION NUMBER.
FAP1H5295/PP4F3008: Chlorpyrifos in or on Tomatoes,
Tomato Pomace, and Meat and Milk. Review of new PP
4F3008 and the amendment of 12/16/83 to FAP 1H5295.

TO: J. Ellenberger, PM 12
Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

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

FROM: R. W. Cook *RW Cook*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

In FAP 1H5295, the Dow Chemical Co. proposed establishment of tolerances for combined residues of the insecticide chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridyl)phosphorothioate; tradename Lorsban™ 4E Insecticide) and its metabolite 3,5,6-trichloro-2-pyridinol; TCP) in or on the animal feed item tomato pomace at 35 ppm. In our 11/20/81 review (K. Arne) of this FAP, we noted the need for a pesticide petition for the U.S. use on tomatoes (the 0.5 ppm tolerance established under PP 2E2092 regulates residues in or on imported tomatoes) which should include additional tomato residue data and a higher tolerance proposal for tomatoes.

More recently, the petitioner proposed a feed additive tolerance of 100 ppm (of which no more than 65 ppm is chlorpyrifos) in tomato pomace (K. Arne, 11/21/83). Because of the animal dietary burden imposed by tomato pomace, we concluded that certain existing meat and milk tolerances may not be adequate, and recommended appropriate changes based upon the animal feeding studies previously reviewed in regard to this chemical. The new pesticide petition proposes the appropriate tolerances for tomatoes, meat and milk. The food additive petition amendment proposes a revised tomato pomace tolerance.

Currently proposed raw agricultural commodity tolerances are:

Tomatoes: 1.5 ppm (of which no more than 1 ppm is chlorpyrifos);
Milk, fat: 0.5 ppm (of which no more than 0.25 ppm is chlorpyrifos);
Milk, whole: 0.03 ppm (of which no more than 0.02 ppm is chlorpyrifos);
Meat, fat, and meat byproducts of cattle:
 2.5 ppm (of which no more than 2 ppm is chlorpyrifos);
Meat, fat, and meat byproducts of goats and sheep:
 2 ppm (of which no more than 1 ppm is chlorpyrifos);
Meat, fat, and meat byproducts of hogs:
 0.5 ppm (of which no more than 0.3 ppm is chlorpyrifos);
Meat, fat, and meat byproducts of horses:
 1.5 ppm (of which no more than 0.8 ppm is chlorpyrifos);

Currently proposed feed additive tolerance is:

Tomato pomace: 100 ppm (of which no more than 65 ppm is chlorpyrifos);

A Codex Sheet is attached. Because the U. S. residue data show the need for a higher tolerance for tomatoes than the 0.5 ppm Codex level, the tomato tolerance cannot be made compatible.

Recommendation:

This amendment resolves the deficiencies noted in our previous review. TOX and EAB considerations permitting, we recommend for the establishment of the proposed tolerances as listed above.

TS-769:RCB:R. Cook:CM#2:RM810:X77324 3/1/84
cc: R.F., Circu, Reviewer, TOX, EEB, EAB, FAP1H5295
RDI: R. Quick, 3/1/84, R. Schmitt, 3/1/84

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INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Chlorpyrifos

PETITION NO. 4F3008 /1H5295

CCPR NO. 17

R. W. Cook
3/2/84

*confirmed 3/5/84
F. L.*

Codex Status

No Codex Proposal Step
6 or above

Proposed U.S. Tolerances

Chlorpyrifos
plus
trichloropyridinol

Residue (if Step 9):
Chlorpyrifos only

Residue: (above)

Crop(s) Limit (mg/kg)

Tomatoes 0.5

Crop(s) Tolerance (ppm)

Tomatoes 1.5
(nmt 1 ppm is chlorpyrifos)
Tomato pomace 100
(nmt 65 ppm is chlorpyrifos)
Milk, fat: 0.5
(nmt 0.25 ppm is chlorpyrifos)
Milk, whole: 0.03
(nmt 0.02 ppm is chlorpyrifos)
Meat, fat, and meat byproducts
Cattle: 2.5
(nmt 2 ppm is chlorpyrifos)
Goats and sheep: 2
(nmt 1 ppm is chlorpyrifos)
Hogs: 0.5
(nmt 0.3 ppm is chlorpyrifos)
Horses: 1.5
(nmt 0.8 ppm is chlorpyrifos);

CANADIAN LIMIT

Residue: _____

MEXICAN TOLERANCIA

Residue: _____

Crop Limit (ppm)

None (on tomatoes)

Crop Tolerancia (ppm)

None (on tomatoes)

Notes: