Shaughnessy No.: 059101
Date Out of EAB: MAY - 1 1987

To: Dennis Edwards
Product Manager 12
Registration Division (TS-767)

From: Emil Regelman, Supervisory Chemist
Review Section #3
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)

Attached, please find the EAB review of...

Reg./File #: 26693-2

Chemical Name: Chlorpyrifos

Type Product: Insecticide

Product Name: Killmaster II

Company Name: Positive Formulators Inc.

Purpose: New use for control of sewer cockroach in manholes

Action Code: 300

EAB #(s): 70120

Date Received: 12/10/86

TAIS Code: 304

Date Completed: 4/30/87

Total Reviewing Time: 2.5 days

Deferrals to: Ecological Effects Branch
Residue Chemistry Branch
Toxicology Branch
1. **CHEMICAL:** Common Name: Chlorpyrifos
   
   Chemical Name: 0,0-diethyl-0-3,5,6-trichloro-2-pyridyl phosphorothioate
   
   Trade Name: Killmaster, Dursban, Lorsban
   
   Submitter: Positive Formulators Inc.
   
   Structure:

```
  C6  C6
  \   \  
  \   \  
  O-P   O-C2 H5
   \  \  
    O-C2 H5
```

2. **TEST MATERIAL:** N/A

3. **STUDY /ACTION TYPE:** Proposed new use of Chlorpyrifos on "sewer roach" residing in manholes.

4. **STUDY IDENTIFICATION:** N/A

5. **REVIEWED BY:**
   
   Paul Mastrandone  
   Chemist  
   EAB/HED/OPP
   
   Signature: [Signature]  
   Date: MAY 1 1987

6. **APPROVED BY:**
   
   Emil Regelman,  
   Supervisory Chemist  
   ECRS#3  
   EAB/HED/OPP
   
   Signature: [Signature]  
   Date: MAY 1 1987

7. **CONCLUSIONS:**

   A. Sufficient environmental fate data are available to determine that EAB can concur with this additional use for this formulation.

   B. Data indicate that the use of chlorpyrifos in natural water systems potentially endangers non-target aquatic organisms. Since this is the case, some label statement defining the limitation to use prior to predicted heavy rainfall may be needed. EAB file data and the label presented appear to indicate that availability of chlorpyrifos is elevated until this formulation is thoroughly dry (approx. 36 hours after application).
C. A similar label warning against direct application or discharge into water within the sewer system should be included on the label.

8. **RECOMMENDATIONS:**

   A. EAB can concur with this additional use for this formulation.
   
   B. EAB suggests that a label statement warning against use of this compound 36 hours prior to predicted heavy rainfalls.
   
   C. EAB further suggests that additional labelling be included warning against direct discharge of the mixed spray compound and/or against cleaning or emptying unused pesticide into the sewer system waters.

9. **BACKGROUND:**

   A. Killmaster 2 is a 2% formulation of the chlorpyrifos active and is registered for use in controlling cockroaches, ants, silverfish, firebrats, crickets and spiders in and around buildings. This is an additional registration for this label. This is considered to be a slow release formulation. Previous label requirements suggest a 36 hour delay before human contact.
   
   B. Presently approved label is appended.

10. **DISCUSSION OF INDIVIDUAL TESTS AND STUDIES:** N/A

11. **COMPLETION OF ONE-LINER:** N/A

12. **CBI APPENDIX:**

    No data appended.