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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: 49244-1. 49244-2. Registration Applications for chlorpyrifos formulations to be used in food handling establishments. No MRID No. RCB Nos. 3204 and 3205.

FROM: Linda S. Propst, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

*Linda S. Propst*

THRU: Andrew R. Rathman, Section Head  
Special Registration Section 1  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

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

Biochemico Dynamic Americas Corporation is requesting to register two 0.9% chlorpyrifos formulations to be marketed as Super-IQ Insecticide Latex Coating LC and Super-IQ Insecticide Coating - APT for use in food handling establishments.

Super-IQ LC and Super-IQ -APT are ready-to-use insecticide coatings designed for long-lasting control of insects such as cockroaches, ants, flies, mosquitoes, wasps, spiders, moths, clover mites, yellow jackets, gnats, crickets, palmetto bugs, and silverfish. It is also useful in the control of pantry pests such as sawtoothed grain beetles, rice weevils, flour beetles, Indian meal moths and cigarette beetles.

Chlorpyrifos [O,O-diethyl O-(3,5,6,-trichloro-2-pyridyl) phosphorothioate] may currently be used in food handling establishments in accordance with the following prescribed conditions:

(1) Application shall be limited solely to spot and/or crack and crevice treatment in food handling establishments where food and food products are held, processed, prepared or served. Contamination of food or food contact surfaces shall be avoided. Food must be removed or covered during treatment.

(2) Spray concentration for spot treatment shall be limited to a maximum of 0.5 percent of the active ingredient by weight. A course, low-pressure spray shall be used to avoid atomization or splashing of the spray.

(3) Paint-on application for spot treatment shall be limited to a maximum of 2 percent of the active ingredient by weight.

(4) Crack and crevice treatment shall be limited to a maximum of 2 percent of the active ingredient by weight. Equipment capable of delivering a pin-stream of insecticide shall be used.

(5) Application via adhesive strips shall contain a maximum of 10% by weight of the controlled-release product in food handling establishments where food and food products are held, processed, prepared or served. A maximum of 36 strips (or 5.15 grams of chlorpyrifos) is to be used per 100 square feet of floor space. The strips are not to be placed in exposed areas where direct contact with food, utensils, and food-contact surfaces would be likely to occur (21 CFR 193.85).

Under the general directions for use, the proposed use would allow for these products to be applied with brush, roller or suitable spraying equipment on masonry surfaces such as walls and ceilings; woodwork, wallpaper and other paper surfaces; primed metal surfaces; cracks and crevices; thoroughly dried painted surfaces; paneling and tiles in and around residential, institutional and commercial buildings.

The proposed label states that when using in establishments where food is stored, processed, prepared or served such as but not limited to groceries, food stores, bakeries, bars, restaurants, cafeterias, grain mills and canneries, apply these insecticides only as a spot treatment and/or crack and crevices treatment. Do not apply on surfaces where food may come in contact or where food may be prepared or processed.

Since these insecticides contain greater than 0.5% active ingredient by weight, RCB requests that the registrant specifically state in that section of the label where directions for use in food handling establishments are given that the spraying of these insecticides in food handling establishments is prohibited.

#### Conclusions and Recommendations

Providing the registrant specifically state in that section of the label under food handling establishments that the spraying of these insecticides in food handling establishments is prohibited, RCB has no objections to registering Super-IQ LC and Super-IQ APT.

cc: Reading File, Food Handling Establishment File, Subject File, Circulation, Reviewer, PMSD/ISB  
RDI: A. R. Rathman, 3/1/88; R. D. Schmitt, 3/1/88  
TS-769:RCB:LSP:lsp:CM-2:Rm803C:557-7324:3/1/88

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