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

JAN 24 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 11540-RT. Request to Add Numerous Sites Including Food-
Handling Establishments to the Registered Label of the
Chlorpyrifos Formulation (Warrior^R). No MRID No.
DEB No. 4786.

FROM: Linda S. Propst, Chemist *Linda S. Propst*
Dietary Exposure Branch
Health Effects Division (TS-769C)

THRU: Andrew R. Rathman, Section Head *ARR*
Special Registration Section 1
Dietary Exposure Branch
Health Effects Division (TS-769C)

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

Micro-Gen Equipment Corp., distributor of the Warrior^R Dual-Action Roach Bait, has submitted a list of numerous sites including food-handling establishments which they wish to add to the list of sites acceptable for use on the currently registered label.

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% of the active ingredient by weight. A coarse, low-pressure spray shall be used to avoid atomization or splashing of the spray.

(3) Paint-on application for spot treatment shall be

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limited to a maximum of 2% of the active ingredient by weight.

(4) Crack and crevice treatment shall be limited to a maximum of 2% 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% of the controlled-released 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).

Warrior^R Roach Bait containers consisting of 0.50% chlorpyrifos are placed in strategic areas where roaches are likely to be.

The submitted list includes aircraft, animal areas & quarter, auditoriums, bakeries, beverage plants, boats, bottling plants, brandy storage warehouses, buildings, buses, cabins, canneries, cattle barns, churches, closets, condominiums, communication centers, correctional facilities, dairy & livestock barns, dried fruit processing plants, drains & sewers, dried fruit warehouses, drugstores, dumpsters, dwellings, egg processing plants, factories, flour mills, food handling establishments, food processing plants, freight containers, fruit packing sheds, garbage cans, garbage compactors, goat houses, grain elevators, grain mills, grain handling equipment, granaries, green houses, homes, horse stables/barns, hospices, industrial installations, institutions, jails, laboratories, libraries, livestock barns, loafing sheds, locker rooms, mills, mausoleums, meat packing plant, milk rooms, missions, mobile homes, museums, mushroom houses, mushroom processing plants, horticultural nurseries, nursing homes, offices, office buildings, passenger rail cars, peanut processing plant, peanut storage warehouses, planes, poultry houses, poultry processing plants, prisons, public buildings, rabbit processing plants, rabbit houses, railroad cars, recreational vehicles, research animal areas, restaurants, restrooms, rice mills, shade houses, ships, shipholds, stables, stable bins, stored food in multi-walled paper or cloth bags, stored seed warehouses, stores, supermarkets, swine houses, textile mills & warehouses, theaters, tobacco plants, tobacco warehouses, townhouses, trains, transportation equipment, trucks, truck trailers, utilities, utility rooms, voids (attics, walls, ceilings), warehouses, wineries, wine storage warehouses, and zoos.

Conclusions and Recommendations

Since this bait insecticide has been placed in a container where it is unlikely to come in contact with food, Dietary Exposure Branch considers the proposed use a non-food use.

Therefore, we have no objections to adding the additional sites listed above to the registered label of Warrior^R Roach Bait.

cc: Reading File, Non-food Use File, Subject File, Circulation,
Reviewer, PMSD/ISB
RDI:A. R. Rathman, 1/23/89; R. D. Schmitt, 1/23/89
TS-769C:DEB:LSP:lsp:CM-2:Rm803C:557-7324:557-7324:1/23/89

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