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PMMSO FLSB



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

SEP 12 1989

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Subject: Chlorpyrifos: Impact of Direct Animal  
Treatments for Livestock on Dietary Exposure,  
Clarification of Use (No MRID No., RD Record  
No. 249459, DEB No. 5646)

From: Elizabeth T. Haeberer, Chemist *Elizabeth T. Haeberer*  
Dietary Exposure Branch  
Health Effects Division (H7509C)

Thru: Debra F. Edwards, Ph.D., Section Chief *R. Edwards for*  
Tolerance Petition Section II  
Dietary Exposure Branch  
Health Effects Division (H7509C)

To: Dennis Edwards, PM-12  
Insecticide/Rodenticide Branch  
Registration Division (H7505C)  
and  
Toxicology Branch  
Health Effects Division (H7509C)

Dow Chemical Company, in the letter of August 3, 1989 (George R. Oliver, Product Registration Manager, North American Ag Products, Dow Chemical U.S.A. to Dennis Edwards, RD) requests a clarification of EPA policy concerning the use of chlorpyrifos in "non-direct" animal treatments.

The DEB memorandum of April 27, 1989 (Chlorpyrifos: Impact of Cattle and Sheep Treatments on Dietary Exposure, Debra F. Edwards) responded to a letter from Dow Chemical U.S.A. requesting Agency thoughts on three potential ways of lowering the anticipated residue of chlorpyrifos such that the ADI is no longer exceeded. The registrant wishes further clarification of Agency policy concerning the following proposal: "If the animal treatment uses were cancelled completely, what would be the Agency's recommendation on the meat tolerance for chlorpyrifos?" Specifically, the registrant assumes that "non-direct" animal treatments such as ear tags and ear wipes would not be included with direct animal treatments such as livestock dips, sprays, spot and pour-on treatments and requests confirmation of this

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interpretation.

Conclusions and Recommendations

The use of chlorpyrifos ear tags or ear wipes could result in the accumulation of residues in animal tissues and milk. EPA policy concerning pesticides, which may be applied to animals in more than one type of formulation or by more than one mode of treatment, is that separate studies reflecting the usage or combination of usages proposed is required. In cases where data from dips or high pressure wetting sprays are available, they may be used in lieu of data for applications of and/or exposure to these pesticides at lower levels. No residue data have been required for the use of ear tags or ear wipes, since residues resulting from direct applications such as dips, sprays or direct pour-on would be higher. If direct animal treatment uses of chlorpyrifos are cancelled, non-direct treatments must be cancelled as well, since no data have been submitted reflecting residues which may occur from this later use. If the petitioner wishes to continue non-direct animal treatments, residue data will be needed reflecting the maximum proposed uses. These residues would be included along with residues from feed sources in determining the appropriate tolerance levels for cattle fat, cattle meat and meat byproducts, milk fat and whole milk.

cc: RF, Circ, Haeberer, PP#3F2884, Reg. Standard File (SRR),  
PMSD/ISB

RDI: D. Edwards, 9/11/89; R. Loranger, 9/11/89