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

DEC 30 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Reference ID No. 071003: Data Call-In Notice for
Product Chemistry and Residue Chemistry for Rotenone
RCB Nos. 1617 and 1620

FROM: Charles N. Frick *e7 12/29/86*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Geraldine W. Werdig, PM Team 50
Data Call-In Program
Registration Division (TS-767C)

THRU: Andrew R. Rathman, Section Head *R. Loranger for*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

Discussion

Two companies have submitted letters protesting Data Call-In notification from the Agency. The companies' rationale is as follows:

Letter from Hilo Products, Inc. states, in part:

I am filing the attached for Hilo Products, Inc. to comply with the requirements of Data Call-In Notice for Product Chemistry and Residue Chemistry Data for Rotenone, for the three referenced products, Hilo Flea Powder with Rotenone, EPA Registration No. 1452-1, Hilo Cat Flea Powder, EPA Registration No. 1452-9, and Hilo Tick and Insect Spray for Dogs, EPA Registration No. 1452-8.

Hilo is not subject to this Data Call-In because the data requirements do not apply to the referenced products.

The focus of the Call-In is to characterize the nature of residues of Rotenone in treated commodities, processing fractions derived from them, and the possible transfer of residue to meat, milk, poultry, and eggs. The three referenced products are directed for use only on domestic household pets for the control of fleas, ticks, mites, etc., and do not pose a problem to the food chain.

Letter from Zoecon Industries states, in part:

After reviewing the EPA's Data Call-In Notice for Product Chemistry and Residue Chemistry for Rotenone, May 28, 1986, it is my opinion that the Zoecon product, Pet'm Flea & Tick Powder, EPA Registration No. 8850-3, is not affected The product is not intended to be used in any manner that would leave residues in or on agricultural commodities as defined in the Rotenone Data Call-In.

Conclusion

RCB deems the request for Residue Chemistry data on the above products not to be appropriate, since no food uses are involved.

Product Chemistry data are required for all pesticide products, whether or not a food use is involved. However, end-use Product Chemistry data for nonfood use products are reviewed by the Registration Division (RD) not RCB. Thus, this Data Call-In notification should be reviewed by the appropriate personnel in RD.

cc: RF; SF; Circ; Reviewer; PMSD/ISB; RDI:ARR 12/18/86;
RDS:12/18/86
87634:Frick:C.Disk:KENCO:12/23/86:sj:vo