



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

MAY 5 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 2724-GUN. Registration application for Zoecon RF-256 Aerosol (Propetamphos) to be used in food handling establishments. Accession Nos. 258735 and 258736. RCB No. 610.

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

Linda S. Propst

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

ARR

TO: William H. Miller, PM #16
Insecticide-Rodenticide Branch
Registration Division (TS-767)

In a letter to William Miller dated 11/18/85, Zoecon Corporation questioned RCB's objection (see L. Propst memo dated 9/26/85) to registering Zoecon RF-256 Aerosol (propetamphos) as a crack and crevice treatment for the control of cockroaches and other pests in food handling establishments.

-A tolerance of 0.1 ppm has been established for residues of the insecticide propetamphos ([[(e)-]-methylethyl 3-[[[(ethylamino) methoxyphosphinothioyl]-2-butenate]]) in food commodities exposed to the insecticide during treatment of food-handling establishments. Direct 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. Spray and dust concentrations shall be limited to a maximum of 1 percent active ingredient. For crack and crevice treatment, equipment capable of delivering a dust or a pinstream of spray directly into cracks and crevices shall be used. For spot treatment, a coarse, low-pressure spray shall be used to avoid contamination of food or food-contact surfaces (21 CFR 193.375).

We recommended against registering Zoecon RF-256 Aerosol for use in food handling establishments because the concentration of propetamphos exceeded the maximum 1% specified in 21 CFR 193.375.

The registrant has presented such arguments that in the Product Chemistry Guidelines proposed by the United States Environmental Protection Agency a certification range of plus or minus 20% for an active ingredient at the 1% level is recommended. The registrant further points out that the Agency recommends that an increase be superimposed on this generally accepted upper range to allow for expected degradation in the active ingredient.

Conclusions and Recommendations

The concentration of propetamphos exceeds the maximum 1% specified in 21 CFR 193.375.

For this reason we recommend against registering Zoecon RF-256 Aerosol for use in food handling establishments.

The registrant should be advised that to give this request further consideration he may choose to revise the formulation for Zoecon RF-256 Aerosol so that propetamphos is nominally 1% plus or minus 20% (not 1.2% plus or minus 20%) or he may choose to submit a new food additive petition requesting a higher limit be specified for the amount of propetamphos allowed.

cc: PM #16, Reviewer, Food Handling Estab. File, PMSD/ISB,
Reading File, Subject File, Circulation

RDI: A. R. Rathman, 5/5/86

TS-769:LSP:lsp:CM-2:Rm810:557-7324:5/5/86