



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

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NOV 21 1983

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: Conference on fenvalerate in food handling establishments.

From: Martha J. Bradley, Chemist *M. J. Bradley*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief *CT*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

To: The files

Attendees: Fred Preiss	MGK
Steve Rogosheske	MGK
Tim Gardner	RD
M. Bradley	RCB

McLaughlin Gormley King Company requested this conference to discuss the deficiencies listed in our memo of 9/11/83 (FAP#3H5383, M. Bradley).

The company agreed to revise the labeling to give minimum retreatment intervals, probably 2 weeks for the general treatment with the more concentrated fenvalerate formulation, to reword the directions for the "general" treatment restricting this use and to delete the directions for use while food processing is underway.

Since this petition is to add pydrin to registered and regulated formulations of synergized pyrethrins, we agreed to drop the requirement for a feed additive regulation (21CFR561) at this time because the meat, milk, and poultry tolerances for pyrethrins, piperonyl butoxide and MGK 264 may not be adequate. These tolerances were established long ago based on dermal applications, not feeding studies. Food handling establishment uses, which also involve animal feeds, have been registered for many years; however 21CFR regulations were only established for human foods as animal feeds were not considered at the time the food additive tolerances were established. The need for livestock metabolism and feeding studies should be addressed, probably when the registration standards are written for pyrethrins, piperonyl butoxide and MGK 264.

cc: R.F., Circu, Reviewer, FAP3H5383, TOX, Pyrethrin S.F.
RDI:Section Head:RSQuick:Date:11/16/83:RDSchmitt:Date:11/16/83
TS-769:RCB:Reviewer:MJBradley:MJB:557-7377:CM#2:RM:810

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