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

MAY 15 1987

EXPEDITE

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#'s 4F3074, 4F3007, and 4E3026. Propiconazole (Tilt® or CGA-64250) on Crops and Livestock Commodities. Revisions to Analytical Methods AG-454A and AG-517. Amendment of May 2, 1987. MIRD Nos. 401807-00, 401807-01, and 401807-02. RCB No. 2262.

FROM: Sami Malak, Ph.D., Chemist *Sami Malak*
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Lois Rossi, PM #21
Fungicide-Herbicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

Note: This is an expedited review at the request of the Registration Division's Director, Mr. E. F. Tinsworth (Letter of 4/14/87).

In RCB memo of subject petitions (S. Malak, 5/14/87), we recommended against the proposed tolerances for small grains requested in PP#4F3074 pending satisfaction of the deficiencies appearing under Recommendations.

1. A revision of the label restriction to read "Do not graze or feed livestock on treated forage, or harvest

treated crop for hay or silage." The "straw" statement may remain or be changed to "Straw may be used for feed or bedding."

2. A revised complete copy of the proposed enforcement methods AG-454A and AG-517 as follows:
 - a. For Method AG-454A-page 9 #IIC.2.5: The "0.225 g crop equivalent (3 ml) aliquot" must be changed to "0.675 g crop equivalent (9 ml)."

-page 11 #IIC.4.2: The partition with 15 ml of 10% diethylether/hexane must be repeated twice for a total of three extractions.
 - b. For Method AG-517-page 10 #IIC.2.5: The "0.225 g crop equivalent (3 ml) aliquot" must be changed to "0.675 g crop equivalent (9 ml)."
3. Propose tolerances for livestock commodities at the following levels:
 - 0.2 ppm for the liver and kidney of cattle, goats, hogs, horses, poultry, and sheep.
 - 0.1 ppm for the meat, fat, and meat byproducts (except liver and kidney) of cattle, goats, hogs, horses, poultry, and sheep.
 - 0.1 ppm for eggs
 - 0.05 ppm for milk

PP#'s 4F3007 and 4E3026: RCB continues to recommend against the proposed tolerances in/on pecans and bananas until revised copies (as stated above) of the proposed enforcement methods are revised and determined to be acceptable.

In this submission, Ciba-Geigy responded to requirement #2 by submitting the necessary revisions to analytical methods AG-454A and AG-517. The original corrected pages replaced the corresponding pages in the previously submitted data package of these two methods. Currently, RCB is completing the report on the results of methods AG-454A for crops and method AG-517 for livestock. The results are satisfactory and these methods will be recommended for enforcement.

This submission resolves requirement #2.

As stated in Conclusion #7 of subject petition (S. Malak, 5/14/87), RCB has no objections for establishing the following requested permanent tolerances:

- ° PP#4F3007: 0.1 ppm for Pecans.
- ° PP#4E3026: 0.2 ppm for bananas.

Recommendations

1. PP#4F3074:

RCB continues to recommend against the requested tolerances for rice grain and straw, and small grains and their straws, pending resolution of deficiencies #1 and 3 stated under the Recommendations (subject petition, S. Malak, 5/14/87).

2. PP#4F3007 and 4E3026:

TOX considerations permitting, RCB has no objections for establishing the following requested permanent tolerances for residues of propiconazole:

- ° PP#4F3007: 0.1 ppm for Pecans.
- ° PP#4E3026: 0.2 ppm for bananas.

cc: Circu, RF. SF (propiconazole or Tilt®), S. Malak,
PP#4F3007, PP#4F3074, PP#4E3026, and PM # 21.
RDI: P. V. Errico:5/15/87:R. D. Schmitt:5/15/87
TS-769C:RCB:CM#2:RM814A:S.Malak:X557-4379:5/14/87.