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

3 JUN 1987

EXPEDITE

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#'s 4F3074. Propiconazole (Tilt®, Banner®, or CGA-64250®) on Crops and Livestock Commodities. A Need for a Revised Sections B. No Accession or MIRD Numbers.

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: Philip V. Errico, Section Head *Philip V. Errico*
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

The proposed propiconazole (Tilt®, Banner®, or CGA-64250®) label amendment, dated 5/12/87 carries the following precautions:

1. Notes under Directions for Rice:
"To avoid possible illegal residues, 1) Do not apply to stubble ratoon crop rice; 2) Do not use water drained from treated fields to irrigate other crops; 3) Do not use in California".
2. Precautionary Statements, Environmental Hazards:
"This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes."

It was brought to our attention by L. Rossi (PM, RD) that the issue of crayfish farming and the use of flood water from treated fields in catfish ponds was not addressed in any of the RCB memos on Tilt. The issue of crayfish was discussed by S. Malak/RCB with N. Cook/EEB and B. Conerly/EAB. RCB has now determined that the petitioner should submit residue data in/on crayfish and catfish under conditions as those proposed for the use on rice. The data should be submitted to the Agency along with a Section F proposing an appropriate tolerance for residues of propiconazole in/on fish and shell fish. Alternatively, the label precautions appearing as Notes under the directions for rice should be amended to include the following warning:

"Do not use in rice fields where commercial farming of crayfish will be practiced. Do not drain water from treated rice fields in ponds used for commercial catfish farming".

cc: Circu, RF. SF (propiconazole, Banner®, Tilt®, or CGA-64250®), S. Malak, PP#4F3007, PP#4F3074, PP#4E3026, PM #21, Robert Thompson (RTP), FDA, EAB, and PMSD/ISB.
RDI:P. V. Errico:6/2/87:R. D. Schmitt:6/3/87
TS-769C:RCB:CM#2:RM814A:S.Malak:X557-4379:6/1/87.