

US EPA ARCHIVE DOCUMENT



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

RD

DEC 15 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 100-617. Tilt^R (propiconazole) residues on grass seed screenings incorporated into animal feed. No MRID No. DEB No. 4687.

FROM: Linda S. Propst, Chemist
Dietary Exposure Branch
Health Effects Division (TS-769C)

Linda S. Propst

THRU: Andrew R. Rathman, Section Head
Special Registration Section 1
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TO: Lois A. Rossi, PM 21 ✓
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Agricultural Division of Ciba-Geigy Corporation has informed the Agency that the Oregon Department of Agriculture informed Ciba-Geigy that as a result of FDA testing, propiconazole residues ranging from 0.2 to 20 ppm have been found in grass seed screenings which were being used as a component in animal feed.

Tilt^R 3.6E was registered for use on grass grown only for seed as a non-food use. Therefore, no food/feed additive tolerances have been established to cover residues of propiconazole on grass seed or grass seed screenings.

The registrant has stated that a petition is pending for tolerances to cover residues of propiconazole in grass hay at 5.0 ppm and in grass forage at 0.5 ppm.

In the interim "to avoid illegal residues" the registrant proposes to place restrictions on the label against feeding hay cut within 20 days of the last application or grazing treated areas within 140 days of the last application which is less restrictive than the current restriction which prohibits any feeding of the treated plant or plant parts (which would include the seed screenings and straw).

Conclusions and Recommendations

Since current labeling of Tilt^R prohibits the feeding of treated crop and crop wastes to livestock, screenings from grass seed treated with Tilt^R with or without residues of propiconazole are prohibited from being used as a component of livestock feed.

In light of the current situation, the registrant should be advised that Dietary Exposure Branch will be reluctant in the future to consider grass grown only for seed a non-food use even though there are restrictions against the feeding or grazing of treated crop or crop waste on the label. We believe this use should be eliminated from the label or residue data submitted and appropriate tolerances should be proposed for grass straw and seed screenings since information available to us indicates that these plant parts are being fed in spite of restrictions to the contrary.

cc: Reading File, Circulation, Subject File, Reviewer, PMSD/ISB
RDI: A. R. Rathman, 12/14/88; R. D. Schmitt, 12/14/88
TS-769:DEB:LSP:lsp:CM-2:Rm803C:557-7324:12/15/88