UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

FEB 1 1989

FEB 1 [illegible]

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: TILT Fungicide - Use on Grass Grown For Seed
Amendment to Pesticide Petition 9F3706

TO: Mr. Larry Schnaubelt, Acting Product Manager 21
Registration Division (TS-767)

FROM: Byron T. Backus, Toxicologist Byron T. Backus 1-25-89
Fungicide/Herbicide/Antimicrobial Toxicology Branch
HED (TS-769C)

THROUGH: K. Clark Swentzel K. Clark Swentzel 1/26/89
Acting Section Head, Review Section II
Fungicide/Herbicide/Antimicrobial Toxicology Branch
HED (TS-769C)

and

Marcia van Gemert, Acting Branch Chief Marcia van Gemert 1/26/89
Fungicide/Herbicide/Antimicrobial Toxicology Branch
HED (TS-769C)

EPA Record No. 237877

Project No. 9-0659A

EPA Reg. No. 100-617

Tox. Chem. 323EE

Background:

The registrant (Ciba-Geigy Corporation) is proposing establishment of a tolerance of 10.0 ppm for propiconazole and its metabolites determined as 2,4-dichlorobenzoic acid and expressed as the parent compound in or on grass screenings used as livestock feed.

Comments and Recommendations:

1. The memorandum of December 16, 1988 from Linda S. Propst, Dietary Exposure Branch, states in part that tolerances established for residues of Propiconazole in or on the fat and meat of cattle as well as milk would appear to cover tolerances in these commodities from feeding livestock grass with 20 ppm residue, but secondary residues in kidney and liver might exceed established tolerances of 0.2 ppm.

2. Ciba-Geigy is proposing establishment of a tolerance of 10 ppm for Propicanazole and its metabolites in or on grass screenings used as livestock feed. Part of the supporting data for this tolerance is from a 3-level dairy feeding study in which residues were found in kidney and livers (but not milk, omental fat, perirenal fat, tenderloin or round) of cattle which were fed 15 ppm.

3. HFASB would have no objections, based on toxicological considerations, to the feeding of treated hay and grass seed screenings with a residue of 10 ppm Propiconazole to livestock, provided that the resulting secondary residues are within the limits of established tolerances, which are indicated below:

milk	0.05 ppm
kidney, liver	0.2 ppm
omental fat, perirenal fat, tenderloin, round	0.1 ppm

4. HFASB defers to the Dietary Exposure Branch as to whether or not the established tolerances indicated above will be exceeded.