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

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JAN 28 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Tilt Fungicide (Propiconazole). Residue Chemistry Requirements for Label Amendment to Add an Additional Application to Winter Wheat. CBRS No. 8758. DP Barcode D169890.

FROM: Felecia A. Fort, Chemist *FA Fort*
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THRU: William J. Hazel, Ph.D., Section Head *W. J. Hazel*
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TO: Benjamin Chambliss/ Susan Lewis PM 21
Fungicide-Herbicide Branch
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CIBA-GEIGY Corporation is requesting information regarding residue chemistry requirements to support a proposed label amendment. This amendment is for an additional application of Tilt fungicide to winter wheat. Currently a single treatment is applied to control foot rot (Pseudocercospora spp.) at tillering (growth stage 4-5) or to control foliar diseases later in the growing season. The proposed label will allow two applications per season. One application would be applied at growth stage 4-5 for control of foot rot and a second treatment would be applied at growth stage 6-8 for control of foliar diseases. CIBA-GEIGY is requesting information on the number of trials needed and specifically the number of locations.

The registrant contends that foot rot is a problem associated with winter wheat in the Pacific Northwest. Also since Tilt fungicide is applied to the emerging flag leaf, it will not be economical for growers to make the early application unless foot rot is anticipated to be a problem. Consequently, the registrant is suggesting that residue field trials reflecting two treatments per season would only be needed in wheat growing areas of the Pacific Northwest as opposed to full geographic representation.

Conclusions

CBRS concludes that trials may be conducted only in the wheat growing areas of the Pacific Northwest; however, restrictions must be placed on the label limiting the second application to winter wheat and the specific locations for which residue data have been submitted and approved. CBRS is not certain exactly which states CIBA-GEIGY is considering to be in the Pacific Northwest; however, we will consider the states of Oregon and Washington to be classified as such. Consequently, two field trials conducted on winter wheat in Oregon and/or Washington would be considered sufficient for the label amendment assuming that BEAD finds the above restrictions reasonable.

Alternatively, the registrant must submit residue studies representative of all wheat growing areas to amend the label without geographic restrictions.

A protocol may be submitted to CBRS for review before beginning field trials.

NOTE: CBRS's conclusions are tentative pending considerations by BEAD. According to RD the package has been forwarded to BEAD.

cc: Reviewer(F. Fort), C. Furlow(PIB/FOD), RF, SF, Circ.
RDI: WJHazel:1/27/92:EZager:1/27/92
H7509C:CBRS:CM#2:Rm800-E:FAFort/FF:12/19/91