MEMORANDUM


FROM: G.F. Kramer Ph.D., Chemist Tolerance Petition Section III Chemistry Branch I, Tolerance Support Health Effects Division (7509C)

THRU: P.V. Errico, Section Head Chemistry Branch I, Tolerance Support Health Effects Division (7509C)

TO: George LaRocca, Product Manager John Hebert, Team 13 Reviewer Registration Division (7505C)

Miles Inc. previously requested tolerances for cyfluthrin (cyano (4-fluoro-3-phenoxyphenyl) methyl 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate) on cattle tissues at 0.4 ppm and milk at 0.08 ppm. This petition is connected with the proposed registration of Bayocide Pour-On Insecticide (1% cyfluthrin) to control flies and lice on beef and dairy cattle.

CBTS recommended against this petition as a result of the following deficiencies (Memo, R. Lascola 12/13/91): 1) no dermal metabolism study was available to support this pour-on use and 2) the registrant had not determined whether cyfluthrin residues concentrate in milkfat. If residues do concentrate, a revised Section F with a proposed tolerance for milkfat would be required.

In the previous amendment (9/14/93), the registrant proposed a tolerance of 6.4 ppm based on 0.08 ppm in whole milk. The samples from which this tolerance was determined contained only 1.3% milkfat. CBTS determined that a tolerance of 2.5 ppm would be appropriate as whole milk must contain at least 3.25% milkfat (Memo, G. Kramer 11/4/93). In the current amendment, the registrant has proposed the following tolerances for cyfluthrin:
Milk -- 0.08 ppm

Milkfat -- 2.5 ppm
  (reflecting 0.08 ppm in whole milk)

Meat, fat and mbp of cattle -- 0.40 ppm

RECOMMENDATION/CONCLUSIONS

Section F has been revised as requested by CBTS. However, we will withhold recommendation on these tolerance requests until after resolution of issues concerning the need for a dermal metabolism study (Memo, G. Kramer 2/2/94).

Note to PM: When these tolerances are established, they should be listed in 40 CFR § 180.436 as:

Milkfat -- 2.5 ppm
  (reflecting 0.08 ppm in whole milk)

Meat, fat and mbp of cattle -- 0.40 ppm

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