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

AUG 1 1986

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#4E3026 (no Acc. number): Propiconazole (Tilt®) In Or On Bananas.
Amendment of 2/26/86 (RCB #1033 and #1040)

FROM: W. T. Chin, Chemist *W. T. Chin*
Tolerance Petition Section III
Residue Chemistry 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-769)

TO: Henry M. Jacoby, PM #21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In a previous review of PP#4E3026 (6/20/84 memo of K. H. Arne), RCB recommended against the proposed tolerance for residues of the fungicide propiconazole (CGA-64250, Tilt®), 1-(2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl)methyl-1H-1,2,4-triazole, and its metabolites determined as 2,4-dichlorobenzoic acid in or on bananas at 1.0 ppm and deferred to TOX as to whether all triazole containing metabolites should be included in the tolerance expression. RCB has pointed out that if these compounds are not to be included in the tolerance expression, then the submitted data would support a tolerance of 0.2 ppm on bananas, provided a method trial is successful. A method trial was not recommended until TOX responds to RCB's deferral.

In response to RCB's 6/20/84 recommendation, the petitioner, CIBA-GEIGY, has submitted a cover letter (Richard L. Conn, 2/26/86) to Henry M. Jacoby (EPA) with a revised Section F. The original deficiency specified in RCB's 6/20/84 Recommendation is restated below, followed by the petitioner's response and RCB's comment/conclusion.

Deficiency

"We recommend against the proposed tolerance. Further consideration awaits TOX's answer to our deferral as to whether all triazole containing metabolites should be included in the tolerance expression. If these compounds are not to be included in the tolerance expression, then the submitted data would support a tolerance of 0.2 ppm on bananas, provided a method trial is successful. If triazole containing metabolites are to be included in the tolerance expression, then additional residue data and appropriate methodology will be needed."

The Petitioner's Response

The petitioner submits a revised Section F in which the proposed tolerance of propiconazole in or on bananas is raised from 0.1 ppm to 0.2 ppm.

RCB's Comment/Conclusion

RCB accepts the revised Section F. However, further consideration awaits TOX's decision regarding the tolerance expression. Therefore, RCB concludes that this deficiency is still outstanding.

RECOMMENDATION

At this time, RCB continues to recommend against the proposed tolerance of propiconazole in or on bananas. Further consideration awaits TOX's answer to our deferral as to whether all triazole containing metabolites should be included in the tolerance expression. RCB will accept a tolerance of 0.2 ppm in or on bananas, as proposed in the revised Section F, if TOX concludes that all triazole containing metabolites are not included in the tolerance expression. However, if TOX does conclude that triazole containing metabolites are to be included in the tolerance expression, then additional residue data and appropriate methodology will be needed. RCB has requested a method trial for the determination of propiconazole in beef liver, milk and eggs (PP#4F3074, Acc. #073102, A. Smith's 6/18/86 memo).

cc: Circu., R.F., EAB, PP#4E3026, EEB TOX, PM#21, W.T.Chin, RMSD-ISB
RDI: P.V.Errico(7/30/86)
TS-769: RCB: CM#2, RM812,557-4352, W.T.Chin,wc(7/30/86)