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

EXPEDITE

MAR 13 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#'s 4F3007, 4F3074, and 4E3026. Propiconazole (Tilt® or CGA-64250) on Crops and Livestock Commodities. Expedited Method Trial Request for Methods AG-454A and AG-517. Request for Additional Validation Data. RCB#'s 1782 and 1915

FROM: Sami Malak, Ph.D., Chemist
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: P. V. Errico, Section Head
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Lois Rossi, PM #21
Fungicide-Herbicide Branch
Registration Division (TS-767)

As per the request of the Registration Division's Director, Mr. E. F. Tinsworth (Letter of 3/4/87), RCB has expedited method trial request to Chemical Operation Branch/BUD for Ciba-Geigy's method No. AG-454A, entitled: "Determination of Total Residues of Propiconazole in Crops As 2,4-Dichlorobenzoic Acid By Capillary Gas Chromatography; December 8, 1986", and method No. AG-517, entitled: "Determination of Total Residues of Propiconazole in Meat, Milk and Eggs As 2,4-Dichlorobenzoic Acid By Capillary Gas Chromatography; January 9, 1987."

In the submitted methods, we note that the petitioner included validation studies for plant and animal commodities in which the recoveries were reported as averages. The petitioner should be advised to submit the recoveries of

the validation studies for small grains, rice, pecan nutmeats, bananas, eggs, milk, and meats of livestock as individual results, ranges and averages. Furthermore, sample chromatograms of standard, fortified, and control samples, as well as a sample calculation of the magnitude of propiconazole residues in/on these commodities should also be submitted. These data are needed in addition to a successful MTO by Chemical Operation Branch/BUD.

Note to PM:

A deferral to TOX was made in connection with PP#4F3074 as to their concern regarding the toxicological significance of residues containing the triazole moiety (memo of A. Smith, 12/31/86). This question needs to be resolved so that an assessment can be made as to the need for additional metabolism studies and analytical methodologies specific for the triazole moieties contributed by propiconazole.

cc: RF, Circu, S. Malak, PP#4F3007, PP#4F3074, PP#4E3026, PM # 21, and MTO File.
RDI: P. V. Errico:3/12/87:R. D. Schmitt:3/12/87
TS-769C:RCB:CM#2:RM814A:S.Malak:X557-4379:3/11/87