PP# 3674

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

AUG 15 1990

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#0F3869: Propiconazole (Tilt®) in or on Celery.
Amendment of 3/1/90 (MRID #414868-1, -2; DEB #6724)

FROM: W. T. Chin, Ph.D., Chemist
Tolerance Petition Section III
Dietary Exposure Branch
Health Effects Division (H7509C)

THRU: Philip V. Errico, Section Head
Tolerance Petition Section III
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: Susan Lewis, PM #21
Fungicide-Herbicide Branch
Registration Division (H7505C)

and

Toxicology Branch
Health Effects Division (H7509C)

BACKGROUND

The petitioner, Ciba-Geigy Corp, submitted an amendment dated 3/1/90 responding to the deficiencies regarding a 5.0 ppm tolerance request for the residues of propiconazole in/on celery in connection with PP#8F3674. The original deficiencies identified in the Conclusion section of C. Deyrup's 12/14/88 memo and the petitioner's responses are restated below, followed by DEB's comments/conclusions.

Summary of Deficiencies Remaining to be Resolved

None.

RECOMMENDATION

Tox considerations permitting, DEB recommends for the establishment of a tolerance for the combined residues of propiconazole and its metabolites determined as 2,4-dichlorobenzoic acid and expressed as the parent compound in or on the raw agricultural commodity celery at 5.0 ppm.

DETAILED CONSIDERATIONS

Deficiency No. 1 (Conclusion #4 of C. Deyrup's 12/14/88 memo)

The petitioner needs to submit data to support the stability of the extracts, which could be strongly basic. The extracts were stored up to four months at some unspecified temperature. Without storage stability data on the extracts, DEB cannot judge the adequacy of the residue data on celery.

The Petitioner's Response

A report entitled Determination of extract storage stability for total propiconazole residues in weathered crops (MRID #414868-2) was submitted. Results indicated that propiconazole residues in extracts of silage-stage corn forage and soybeans are stable for at least 3 and 8 months, respectively, when stored at 4°C. Celery extracts reported previously were stored at 4°C for only 9 to 48 days. Therefore, the residue data so generated for celery should be considered adequate to support the requested 5.0 ppm tolerance.

DEB's Comment/Conclusion

DEB concludes that the deficiency specified above has been adequately resolved.

Deficiency No. 2 (Conclusion #5a of C. Deyrup's 12/14/88 memo)

The petitioner needs to submit standard curves which are used to generate the residue data for celery in order to demonstrate the linearity of the detector response.

The Petitioner's Response

A report entitled Response to EPA Conclusions, Propiconazole-Celery Magnitude of Residue (3/1/90, MRID #414868-1) was submitted. Five complete sets of standards and the corresponding standard curves are provided for generating residue data in or on celery samples based on linear repression standard curve.

DEB's Comment/Conclusion

DEB concludes that the deficiency specified above has been adequately resolved.

Deficiency No. 3 (Conclusion #5b of C. Deyrup's 12/14/88 memo)

The petitioner needs to specify whether any of the residue data on celery from CA reflect furrow irrigation. If no data reflecting the use of furrow irrigation have been submitted, the petitioner will need to submit residue data reflecting this use.

The Petitioner's Response

The two CA field tests originally reported in this petition were both conducted using furrow irrigation. Re-issued AG-A Report submitted with this amendment shows additional information as summarized below:

AG-A No.	Field Test No	Description of Irrigation
8160A	OW-FR-301-84-CA	Fields pre-irrigated prior to planting by sprinkling. Furrow irrigated prior to applications of propiconazole. Furrow irrigated through remainder of test at 7- to 10- day intervals, 24-hours runs.
8599A	OW-FR-501-84-CA	Furrow irrigation, 10-day intervals, 24-hour runs. See AG-A Report for actual dates.

DEB's Comment/Conclusion

DEB concludes that the deficiency specified above has been adequately resolved.

cc: Circu., R.F., W.T.Chin, PP#0F3869, PP#8F3674, R.D.Schmitt
PIB/FOD and DRES/SACB

RDI: P.V.Errico (8/14/90): R. Loranger (8/14/90):
H7509C:DEB:CM#2,RM812,557-4352,W.T.Chin,wc(8/15/90)

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