



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

*No Response
Necessary Tolerance
Established Over
a year ago.
JWS*

SEP 17 1990

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Propiconazole: Permanent Tolerances on Grass, Hay
and Forage and Removal of Feeding and Grazing
Restrictions from Grasses Grown for Seed

TO: Lewis/Stone, PM 21
Registration Division (H7505C)

FROM: Byron T. Backus, Ph.D., Toxicologist *Byron T. Backus 9/13/90*
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THROUGH: K. Clark Swentzel *K. Clark Swentzel 9/14/90*
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and

Marcia van Gemert 9/14/90
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EPA Record No. 235528

Project No. 9-0431

EPA Identifying No. 9F3706

Tox. Chem. 323EE

Action Requested:

Review for permanent group tolerances for Tilt in grass, hay and forage and to remove feeding and grazing restrictions from grasses grown for seed.

Comment and Recommendation:

The material in this submission relating to establishment of tolerances for propiconazole and its metabolites in grass screenings used as livestock feed has been addressed by HFASB in memoranda dated February 1, 1989 and February 23, 1989 (refer to the attached copies). The following comments (made in the memorandum of February 23, 1989) are also relevant to establishment of permanent tolerances for Tilt in grass, hay and forage:

1. HFASB concurs with DEB that a major concern in the issuance of these tolerances involves the adequacy of the characterization of only approximately 21% of the residues of potential toxicological significance (particularly as the parent compound and some of the metabolites contain the chlorophenyl moiety) in the previously submitted livestock metabolism study.
2. HFASB would not object to establishment of tolerances with expiration dates on the subject feeds with concomitant revised tolerances of 2.0 ppm (with expiration date) for liver and kidney, provided Ciba Geigy is committed to generating data to address the deficiencies indicated in the DEB memorandum of 2/7/89 (H. Fonouni to L. Rossi).