



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

JAN 19 1989

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Oregon Section 18 Exemption Request to Feed
Grass Seed Straw/Screenings with Residues of
Propiconazole to Livestock

TO: Mr. Larry Schnaubelt, Product Manager 21
Registration Division (TS-767)

FROM: Byron T. Backus, Toxicologist *Byron T. Backus* 1/18/89
Fungicide/Herbicide/Antimicrobial Toxicology Branch
HED (TS-769C)

THROUGH: K. Clark Swentzel *K. Clark Swentzel* 1/18/89
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and
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Marcia van Gemert, Acting Branch Chief
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EPA Record No. 237313

Project No. 9-0603A

EPA Reg. No. 100-617

Tox. Chem. 323EE

Background:

The Oregon Department of Agriculture has requested a section 18 exemption for the use of propiconazole-treated grass and seed crop wastes as livestock feed commodities. Current labeling for the propiconazole-containing product for treatment of grass seed crops includes restrictions that livestock are not to be allowed to graze on treated areas, and the crop and/or its wastes are not to be used for livestock feed or bedding. The estimate is that approximately 40% of the 325,000 acres of the grass seed crop has been treated 1-3 times with Propiconazole.

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Comments and Recommendations:

1. If only 40% of the grass seed crop has been treated with Propiconazole, some of the values should be adjusted downward. For example, the statement is made that "fees for 50% of the screenings at \$35/ton would amount to \$525,000." However, 40% of 30,000 tons (the total amount of grass seed screenings is 12,000 tons; this multiplied by \$35/ton would be \$420,000. Likewise the statement that 30,000 tons of seed screenings at \$55 a ton would have a value of \$1.65 million has to be revised. Again, 40% of 30,000 tons would be 12,000 tons, which at \$55/ton would have a value of \$660,000.
2. The memorandum of December 16, 1988 from Linda S. Propst, Dietary Exposure Branch, states in part that: "As a result of FDA testing, propiconazole residues of 0.2 to 2.0 ppm had been discovered in grass seed screenings which were being used as a component of animal feed. However, additional analyses have indicated residue levels as high as 20 ppm." This memorandum also notes that tolerances established for residues of propiconazole in or on the fat and meat of cattle as well as milk would appear to cover tolerances in these commodities from feeding livestock grass with 20 ppm residue, but secondary residues in kidney and liver might exceed established tolerances of 0.2 ppm.
3. HFASB would have no objections, based on toxicological considerations, to the feeding of Propiconazole-treated hay and grass seed screenings to livestock, provided that the resulting secondary residues are within the limits of established tolerances. There is no assurance in this situation that this would be the case. Therefore, HFASB recommends against this proposed Section 18 exemption.

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