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

SEP 20 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#1F3974 -- Propiconazole (Tilt®) in/on Grasses Grown for Seed. Ciba-Geigy Amendment Dated 7/2/93.

DP Barcode: D192904. CBTS # 12202.

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THROUGH: Debra F. Edwards, Ph.D., Chief
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TO: Sidney Jackson, PM Team 21
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and

Albin Kocialski, Section Head
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In this submission, Ciba-Geigy has responded to deficiencies outlined in our 5/12/93 memo.

Conclusions (pertaining to this memo only)

1. Questions concerning sample handling and storage of samples from the ruminant metabolism study have been resolved and are discussed in our concurrent memo for PP#8F3674.

2. Recovery calculations have been adequately explained.

3. The experimental design of the crop field trials has been adequately explained.

Recommendation

TOX considerations permitting, CBTS has no objection to issuance of the proposed tolerances:

Commodity	Tolerance (ppm)
Grass Seed Screenings	60.0
Grass Hay (Straw)	40.0
Grass, Forage	0.5
Cattle, kidney and liver	2.0
Goats, kidney and liver	2.0
Hogs, kidney and liver	2.0
Horses, kidney and liver	2.0
Sheep, kidney and liver	2.0

Detailed Considerations

Deficiencies listed in our 5/12/93 memo are given with Ciba-Geigy's responses and our comments:

CBTS Deficiency #1b (Conclusion #1b from our 5/12/93 memo)

> The nature of the residue in ruminants will be understood once details of sample handling and length of storage for animal commodities have been submitted (PP#1F3974, S. Willett, memo of 6/11/191; PP#8F3674, M. Flood, memo of 5/6/93). The residue to be regulated is, tentatively, the same as for plants.

Ciba-Geigy Response

The registrant has submitted the identical response to that submitted for PP#8F3674. Our concurrent memo for that petition should be consulted.

CBTS Comment

In our concurrent memo for PP#8F3674, we concluded that the deficiency was resolved for ruminants but not poultry. Since neither grass nor grass seed is a poultry feed item, this deficiency is resolved for this petition.

CBTS Deficiency # 2b

> Recoveries associated with the residue analyses are acceptable; however the petitioner should verify the calculation of recovery from the forage control fortified with 0.1 ppm propiconazole (ABR-92070, page 37, no. 15).

Ciba-Geigy Response

The percent recovery [from the above-cited sample] was reported as 72% and not 90% because of a small peak (0.49 pg) found in the control sample run no. 14), which quantitated to 0.0195 ppm. The control amount was submtracted from the 0.091 recovery before calculating the percent recovered. In future Ciba reports, an intermediate value will be inserted into the caption line for procedural recovery samples in order to show ppm corrected for control amount.

CBTS Comment

This deficiency is resolved.

CBTS Deficiency #3

> Acceptable residue data were generated from 8 field trials....the registrant should state whether the two replicate samples from plots treated at the 1X rate refer to two composities from one treated plot or one composite each from two independently treated plots.

Ciba-Geigy Response

In three out of the eight field residue trials (OW-FR-628-91, OW-FR-629-91, OW-FR-630-91), Rep A and Rep B test plots were established as separate entities, i.e. the test material for the 1X rate treatment was independently mixed for and sprayed on test plots Rep A and Rep B. Composite samples from the Rep A and Rep B plots were collected separately and labeled appropriately.

In the other five field trials.... the test material was mixed for and sprayed on the entire 1X treatment area. The treated area was then divided to establish test plots Rep A and Rep B. Samples were collected separately from the Rep A and Rep B test plots and labeled as above.

CBTS Comment

This deficiency is resolved.

There are hardly sufficient field trials to draw conclusions from the results of the two types of experiments, but we note that the average of the relative standard deviations from average residues from the five field trials were higher with seed and seed screenings and lower with straw. In general we would expect more variability in the residues from the three field trials.

cc: RF, Circu., Mike Flood, E. Haeberer, PP#1F3974.
H7509C:CBTS:Reviewer(MTF):CM#2:Rm804P:703-305-7990:typist(mtf):9/20/93.
RDI:SectionHead:ETHaeberer:9/20/93:BranchSeniorScientist:RALoranger:
9/20/93.

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