



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Response to DEB's Recommendation (Memorandum of 2/15/89) Regarding Tolerances with Expiration Dates for Tilt^R

FROM: Byron T. Backus, Toxicologist *Byron T. Backus* 2/23/89
Herbicide/Fungicide/Antimicrobial Support Branch
HED (TS-769C)

THROUGH: K. Clark Swentzel *K. Clark Swentzel* 2/23/89
Acting Section Head, Review Section II
Herbicide/Fungicide/Antimicrobial Support Branch
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and *K. Clark Swentzel for* 2/23/89
Marcia van Gemert, Acting Branch Chief
Herbicide/Fungicide/Antimicrobial Support Branch
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TO: Richard D. Schmitt, Ph.D., Acting Chief
Dietary Exposure Branch
HED (TS-769C)

and

Mr. Larry Schnaubelt, Acting Product Manager 21
Fungicide-Herbicide Branch
Registration Division (TS-767)

EPA Reg. No. 100-617

Tox. Chem. 323EE

Background:

The Dietary Exposure Branch has responded to a memorandum from HFASB (2/1/89) on adequacy of established tolerances for residues of Propiconazole in/on livestock commodities as a result of the feeding of treated grass screenings to livestock. DEB has stated that, in a worst case scenario, residues containing the chlorophenyl moiety may exceed established tolerances of 0.2 ppm for liver and kidney, reaching 1.5-2.0 ppm.

Comments and Recommendations:

1. HFASB concurs with DEB that a major concern in the issuance of these tolerances involves the inadequacy 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).