



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

JUL 24 1985

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: CGA-64250; Tilt® Fungicide; EAB Deferral (1/4/84);  
Shaughnessy #122101; Action Code 315

TO: Henry M. Jacoby, PM 21  
Registration Division (TS-767)

FROM: Alan C. Katz, M.S., D.A.B.T. *Alan C. Katz*  
Toxicology Branch  
HED (TS-769) *7/18/85*

THROUGH: *[Signature]* *7/18/85*  
Robert P. Zendzian PhD, Acting Head  
Review Section IV  
and  
Theodore M. Farber PhD, Chief  
Toxicology Branch *[Signature]* *7/24/85*

Compound CGA-64250

Caswell #: 323EE (CGA-64250)

Reg./File #100-617

Registrant: Ciba-Geigy

Accession #251239; 251511

Data Review Rec.#: 105363 (attached)

Action Requested:

Incremental risk assessment per EAB's deferral on exposure evaluation for the use of Tilt® for sugarcane seed piece treatment.

Recommendations:

The Toxicology ad hoc committee will address risk associated with use of CGA-64250 following submission of additional data which has been requested from the registrant with respect to the 2 year feeding study in rats.

EAB has deferred to Tox Branch on assumption of dermal absorption of 24%. In order to evaluate the validity of this assumption, we must review all pertinent data submitted by the registrant. The Tox Branch has requested and obtained copies of Accession Nos. 251239 and 251511. A separate Data Review Record should be issued by the Product Manager in order to authorize and properly track a review of these data by the Tox Branch.