



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

AUG 8 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#2F04154; Fenbuconazole, Indar® 2F Agricultural Fungicide, (EPA Reg. No. 707-EGR), in or on Bananas. Amendments of 6/30/94 and 7/19/94.
MRID No. none; CBTS No. 14034, 14047.
DP Barcode: D205643, D205182.

FROM: William D. Wassell, Chemist
Tolerance Petition Section I
Chemistry Branch I - Tolerance Support
Health Effects Division (7509C)

Will D. Wassell 8/8/94

THROUGH: Richard A. Loranger, Ph.D., Acting Chief
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R. Loranger

TO: Cynthia Giles-Parker / Dolphine Wilson, PM-22
Herbicide/Fungicide Branch
Registration Division (7505C)

and

Albin Kocialski
Chemical Coordination Branch
Health Effects Division (7509C)

Summary / Background:

Rohm and Haas Company, Philadelphia, PA, requests the establishment of tolerances for residues resulting from the use of the fungicide fenbuconazole (ANSI/ISO) or RH-7592 [alpha-(2-(4-chlorophenyl)-ethyl)-alpha-phenyl-3-(1H-1,2,4-triazole)-1-propanenitrile] and its metabolites RH-9129 and RH-9130, expressed as parent equivalent residues, in or on the raw agricultural commodity bananas (whole fruit) at 0.3 ppm of which not more than 0.05 ppm is contained in the banana pulp.



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The current submission is in response to our review of 08/01/94 (W.D. Wassell, PP#2F04154, DP Barcode: D202611) and consists of a revised Section F and a response to one of the cited deficiencies in our original review of the subject petition. The previously cited deficiencies are restated below followed by the petitioner's response and finally our comments.

Detailed Considerations:

Conclusion 7b: The registrant has requested individual tolerances for banana pulp and peel. Tolerances are generally set on whole bananas or as X ppm in or on bananas (of which not more than Y ppm are in the pulp). CBTS requests a revised Section F in which tolerances are requested for fenbuconazole and its metabolites, expressed as the parent, in or on the raw agricultural commodity bananas as noted above.

A revised Section F was submitted in conjunction with an amendment to the original petition (dated 3/31/94, see our review of 08/01/94, W.D. Wassell, DP Barcode D202611). This revised Section F requested tolerances for the combined residues of fenbuconazole and its metabolites RH-9129 and RH-9130 on bananas (whole fruit) at 0.3 ppm of which not more than 0.05 ppm is contained in the banana pulp, but did not specify that the residues are expressed as parent compound equivalents. In our review of 08/01/94, we advised the petitioner to submit a revised Section F that specified residues are expressed as parent compound equivalents.

Petitioner's Response: The petitioner has submitted a revised Section F that specifies residues are expressed as parent compound equivalents.

CBTS Response: This deficiency is resolved.

Conclusion 7c: The banana bunches were dipped in water and permitted to drip dry after harvest. The registrant indicates that this is a normal agricultural practice. We can find no documentation that indicates this dipping procedure is a normal agricultural practice. Therefore, CBTS would prefer residue data on bananas that are not dipped in water after harvest unless the registrant can provide published information indicating this a normal practice and all commercially produced bananas are handled in this manner.

Petitioner's Response: The petitioner has submitted a letter from C.L. Chia, Ph.D., University of Hawaii at Manoa, Department of Horticulture stating that the washing of the fruit is a routine practice done by the growers in order to prevent staining of the fruit by latex bleed. The washing is done in a tank or tub, but

sometimes with a hose equipped with a spray nozzle. The washed hands are permitted to air dry before the fruit is packed for shipment.

CBTS Response: This deficiency is resolved.

Recommendations:

CBTS can recommend for a tolerance with an expiration date for the combined residues of fenbuconazole and its metabolites, RH-9129 and RH-9130, expressed as fenbuconazole, in or on bananas (whole fruit) at 0.3 ppm of which not more than 0.05 ppm is contained in the banana pulp while the additional field trials (see Conclusion 7a of our review of 08/01/94, W.D. Wassell , DP Barcode: D202611) are being conducted.

For a permanent tolerance, samples from the additional field trials should be analyzed for the fenbuconazole metabolite RH-4911 in addition to the compounds included in the tolerance expression (see Conclusion 3 of our review of 08/01/94, W.D. Wassell , DP Barcode: D202611).

cc: WDWassell, RF, Circ., PP#2F04154

RDI: RSQuick: 08/05/94; MFlood: 08/08/94; RALoranger: 08/08/94.

7509C:CBTS:WDWassell:wdw:CM#2:Rm 804U:305-6135:08/05/94

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