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Proposed Section 18 exemption for the use of triadimefon (Bayleton) on grapes.

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THRU: Charles L. Trichilo, Chief
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The State of California requests a Section 18 exemption to allow the emergency use of Bayleton [1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl) -2-butanone] on grapes to control powdery mildew.

A Section 18 exemption was granted for the use of Bayleton on grapes in the state of New York; however, Residue Chemistry Branch did not review the proposal. Temporary tolerances of 1 ppm for residues of Bayleton on apples and grapes was granted pursuant to PP#0G2300. FAP#1H5282 proposing temporary food additive tolerances for Bayleton on apple and grape byproducts and PP#1G2432 proposing temporary tolerances for Bayleton on wheat and barley are currently pending.

The current request entails the use of 742,500 lbs. active ingedient for the treatment of 660,000 acres of grapes to control powdery mildew. This is the entire grape acreage of California. The proposed use involves applications of Bayleton to grapes at rates of 1 to 3 oz. a.i. per acre. At least 20 gallons of spray solution for ground applications and 10 gallons of spray solution for aerial applications are required. Applications may be repeated as needed up to a total of 9 oz. a.i. per acre per crop season. A 14 day preharvest interval is also required. The use proposed here is exactly the same as the uses proposed for grapes in PP# 0G2300 and FAP#1H5282.

In the reviews of PP#0G2300 and FAP#1H5282 (See the memos of 4/10/80 and 3/2/81 by John Worthington) we concluded that the following would be required for a favorable recomendation for the use on grapes:

1) Deletion of the proposed food additive tolerance for residues in wine.

2) Proposal of a 4 ppm food additive tolerance for residues in apple pomace instead of the separate levels now proposed for wet and dry apple pomaces.

3) Proposal of a 3 ppm food additive tolerance for residues in grape pomace instead of the separate levels now proposed for wet and dry

grape pomaces.
4) Proposal of temporary tolerances of 0.01 ppm in milk, eggs and meat byproducts of cattle, goats, hogs, horses, poultry and sheep.

None of these items are applicable to the requested Section 18 Exemption. Therefore, we can recommend that the request be granted.

Conclusions and Recommendations

1. The fate of Bayleton on grapes is adequately delineated for the purpose of the requested exemption. The residues of concern are Bayleton, per se, and its metabolite, KWG 0519, [β-(4-chlorophenoxy)-α-(1,1-dimethylethyl)-1H-1,2,4-triazol-1-ethanol].

2. Adequate methodology is available to determine residues of Bayleton, per se, and its metabolite KWG 0519 on grapes.

3a. The available residue data adequately demonstrate that residues of Bayleton, per se, and its metabolite, KWG 0519, resulting from the requested exemption will not exceed 1 ppm in fresh grapes.

3b. For the purpose of this exemption, we are willing to conclude the grape processing data indicate that the residues in grape juice, grape pomace and raisin waste will not exceed 2, 3 and 7 ppm, respectively.

4. Secondary residues of Bayleton in meat, milk, poultry and eggs are not expected to exceed 0.01 ppm.

TOX considerations permitting, and contingent upon the establishment of an agreement with FDA regarding the legal status of treated grapesand grape products in commerce, we recommend that the requested exemption be granted.

cc: Reading file
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REviewer
Subject File 18
Section 18
TOX

TS-769:Reviewer:JMWorthington:Type by JMW:LDT:X77324:CM#8:RM:810:
RDI:Section Head:RJB:Date:4/2/81:RDS:Date:4/3/81