

US EPA ARCHIVE DOCUMENT

Shaughnessy No.: 109901

Date Out of EAB: JUL 30 1987

To: Lois Rossi
Product Manager # 21
Registration Division (TS-767)

From: Therese M. Dougherty, Chief
Environmental Chemistry Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769-C)

Attached, please find the EAB review of...

Reg./File # : 3125-340

Chemical Name: Triadimefon (BAYLETON)

Type Product : Fungicide

Product Name : BAYLETON 50% WP

Company Name : Mobay

Purpose : Response to previous review (1/19/83) for additional rotational crop data on peas (pods, forage, vines) and a leafy vegetable.

Action Code: 336

EAB #(s): 70158

Date Received: 12/29/86

TAIS Code: 303

Date Completed: JUL 30 1987

Total Reviewing Time: 1.5 day

Monitoring study requested:

Monitoring study voluntarily:

Deferrals to: Ecological Effects Branch

 Residue Chemistry Branch

 Toxicology Branch

REGISTRATION DIVISION DATA REVIEW RECORD
 Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

1. CHEMICAL NAME

BAYLETON

12-30-86

2. IDENTIFYING NUMBER

3125-340

3. ACTION CODE

336

4. ACCESSION NUMBER

—

TO BE COMPLETED BY PM

5. RECORD NUMBER

186927

6. REFERENCE NUMBER

2

7. DATE RECEIVED (EPA)

12/1/86

8. STATUTORY/DUE DATE

9. PRODUCT MANAGER (PM)

ROSS/Hunter

10. PM TEAM NUMBER

21

14. CHECK IF APPLICABLE

- Public Health/Quarantine Minor Use
 Substitute Chemical Part of IPM
 Seasonal Concern Review Requires Less Than 4 Hours

AH

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS

12-29-86

12. PRIORITY NUMBER

50

13. PROJECTED RETURN DATE

3-13-87

15. INSTRUCTIONS TO REVIEWER

- A. HED Total Assessment - 3(c)(5)
 Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
 B. SPRD (Send Copy of Form to SPRD PM)
 Chemical Undergoing Active RPAR Review
 Chemical Undergoing Active Registration Standards Review
 C. BFSD
 D. TSS/RD
 E. Other

F. INSTRUCTIONS

Please see enclosed letter. Residue Chemistry branch has data currently. PM team can return as you can - let us know —

16. RELATED ACTIONS

17. 3(c)(1)(D)

- Use Any or All Available Information Use Only Attached Data
 Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.

18. REVIEWS SENT TO

- TB EEB EF PL
 RCS EFB CH BFSD

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	ENVIRONMENTAL FATE	<i>1</i>							
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFSD	ECONOMIC ANALYSIS								

20. Label Submitted with Application Attached

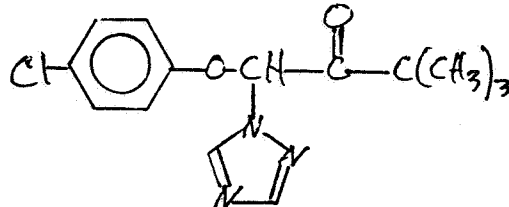
21. Confidential Statement of Formula

22. Representative Labels Showing Accepted Uses Attached

23. Date Returned to RD (to be completed by HED)

24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.

1. CHEMICAL: Common Name- Triadimefon (Bayleton)
- Chemical Name- 1-(4-chlorophenoxy-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone
- Trade Name- BAYLETON 50% WP Fungicide
- Chemical Structure-



2. TEST MATERIAL: Not applicable.
3. STUDY/ACTION TYPE: Mobay Chemical Corp is responding to a previous review (1/19/83) that asked for additional rotational crop data to support 12-month restriction on peas (pods, forage, vines) and leafy vegetables (lettuce or spinach) that would allow them to be used for feed. Also, requested was the confirmation of some tentatively identified compounds in Report #80606.
4. STUDY IDENTIFICATION:
- Residues of BAYLETON in Green Peas, Mobay Chemical Corp, vol II, 2/20/85, Acc. #263172.
 - Residues of BAYLETON in Lettuce, Mobay Chemical Corp., vol II, 2/20/85, Acc. #263172.
5. REVIEWED BY:
- Herbert L. Manning, Ph.D.
Microbiologist
EAB/HED
- Signature: *Herbert L. Manning*
Date: JUL 30 1987
6. APPROVED BY:
- Therese M. Dougherty, Chief
Section 1
EAB/HED
- Signature: *Therese M. Dougherty*
Date: JUL 30 1987
7. CONCLUSION:
- See RECOMMENDATION.

8. RECOMMENDATION:

The data submitted to comply with EAB's request for more rotational crop data on pea pods and vines and on leafy vegetables (lettuce or spinach) pertained to residues in primary crops- not rotational crops. It should be noted that the registrant's letter refers to data dated Feb 20, 1986 (bottom first page), whereas the summary tables were dated Feb 20, 1985.

Until EAB receives rotational crop data on peas and lettuce/spinach that satisfy our concerns, the crop restrictions (label statement in section 9) must remain.

Mobay's response to our request for confirmation of the "tentatively identified" compounds in Report No. 80606 is in the attached letter. The term "tentative identification" referred to the quantitative and not the qualitative nature of the identification.

9. BACKGROUND:A. Introduction

In the cited review, Mobay revised the rotational crop statement to read:

"Small grains, corn, sorghum, soybeans, beans and peas may be planted 35 days after the last application of BAYLETON, however, forage or vines from these crops may not be used for food or feed. Root crops may be planted 120 days after the last application but tops must not be used for food or feed. All crops may be planted 12 months or later after the last application of BAYLETON without any restrictions."

EAB concurred with the 12-month restriction on soybeans, beans, and peas (with use of forage and vines), along with leafy vegetables (lettuce or spinach), if additional rotational crop data was provided on pea pods, vines and leafy vegetables (lettuce or spinach). The application rate to which the crops were exposed was consistent with the current usage (below).

B. Direction for Use

The current application rate for use on wheat is 2-8 oz of 50% WP/A (0.063 lb ai-0.25 lb ai/A); for beets it is 4-16 oz of 50% WP/A (0.125 lb ai-0.5 lb ai/A).

10a DISCUSSION OF INDIVIDUAL STUDY:A. Study Identification

Residues of BAYLETON in Green Peas.

B. Materials and Methods

See Summary Table 16 (separate summary for peas, pods, and green vines).

C. Results

Data is of no value to EAB since it is not from a rotational crop study.

D. Reviewer's Comments

The study was done for the Residue Chemistry Branch. It was not rotational crop data Sam Creeger requested in the 1/19/83 review.

10b DISCUSSION OF INDIVIDUAL STUDY:

A. Study Identification

Residues of BAYLETON in Lettuce.

B. Materials and Methods

See Summary Table 21.

C. Results

Data is not from a rotational crop study.

D. Reviewer's Comments

The data was not as requested.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CONFIDENTIAL APPENDIX:

Contains registrant's letter and tables.

12. CONFIDENTIAL APPENDIX

Triadimefon environmental fate review

Page _____ is not included in this copy.

Pages 7 through 12 are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients
 - Identity of product impurities
 - Description of the product manufacturing process
 - Description of product quality control procedures
 - Identity of the source of product ingredients
 - Sales or other commercial/financial information
 - A draft product label
 - The product confidential statement of formula
 - Information about a pending registration action
 - FIFRA registration data
 - The document is a duplicate of page(s) _____
 - The document is not responsive to the request
-

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
