

US EPA ARCHIVE DOCUMENT

*Manning*  
*hs*  
*file*

Shaughnessy No.: 109901  
Date Out of EAB: MAY 31 1988

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

From: Paul Mastradone, Ph.D., Acting Chief  
Environmental Chemistry Review Section  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769-C)

*PM*  
*checked for*

THRU: Paul F. Schuda, Ph.D., Chief  
Exposure Assessment Branch/HED (TS-769C)

Attached, please find the EAB review of...

Reg./File # : 3125-320 and 3125-340

Chemical Name: Triadimefon

Type Product : Fungicide

Product Name : BAYLETON 50% Wettable Powder and 50% WP in Water Soluble Packets

Company Name : Mobay Chemical Corp

Purpose : Review registrant's response to previous review of July 30, 1987.

Date Received: 12/23/87

Action Code: 335, 336

Date Completed: \_\_\_\_\_

EAB #(s): 80266, 80267

Monitoring study requested: \_\_\_\_\_

Total Reviewing Time: 2.0 days

Monitoring study voluntarily: \_\_\_\_\_

Deferrals to : \_\_\_\_\_ Ecological Effects Branch  
X \_\_\_\_\_ Residue Chemistry Branch  
\_\_\_\_\_ Toxicology Branch

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

HED  
12-23-81

CHEMICAL NAME BAILLITON 44105

2. IDENTIFYING NUMBER <u>3125-310</u>	3. ACTION CODE <u>334</u>	4. ACCESSION NUMBER <u>—</u>	TO BE COMPLETED BY PM 5. RECORD NUMBER <u>210605</u>
			6. REFERENCE NUMBER <u>0</u>
			7. DATE RECEIVED (EPA) <u>12/15/81</u>
			8. STATUTORY DUE DATE
			9. PRODUCT MANAGER (PM) <u>Hess</u>
			10. PM TEAM NUMBER <u>21</u>

14. CHECK IF APPLICABLE

<input type="checkbox"/> Public Health/Quarantine	<input type="checkbox"/> Minor Use	<u>ALL</u>
<input type="checkbox"/> Substitute Chemical	<input type="checkbox"/> Part of IPM	
<input type="checkbox"/> Seasonal Concern	<input type="checkbox"/> Review Requires Less Than 4 Hours	

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS  
12-23-81

12. PRIORITY NUMBER  
50

13. PROJECTED RETURN DATE  
3-7-82

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.  BFS/D  TSS/RD  Other

F. INSTRUCTIONS

16. RELATED ACTIONS 3125-320

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

RCB  EFB  CH  BFS/D

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	<input checked="" type="checkbox"/> ENVIRONMENTAL DATA								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFS/D	ECONOMIC ANALYSIS								

20. <input type="checkbox"/> Label Submitted with Application Attached	21. <input type="checkbox"/> Confidential Statement of Formula	22. <input type="checkbox"/> 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.

**REGISTRATION DIVISION DATA REVIEW RECORD**

*Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)*

415)  
12-23-87

CHEMICAL NAME

*BIBHA BAYLETON*

*44105*

2. IDENTIFYING NUMBER <i>3125-320</i>	3. ACTION CODE <i>335</i>	4. ACCESSION NUMBER <i>—</i>	TO BE COMPLETED BY PM
			5. RECORD NUMBER <i>210609</i>
			6. REFERENCE NUMBER <i>21</i>
			7. DATE RECEIVED (EPA) <i>12.15.87</i>
			8. STATUTORY DYE DATE
			9. PRODUCT MANAGER (PM) <i>K. Redi</i>
			10. PM TEAM NUMBER <i>21</i>

14. CHECK IF APPLICABLE

<input type="checkbox"/> Public Health/Quarantine	<input type="checkbox"/> Minor Use
<input type="checkbox"/> Substitute Chemical	<input type="checkbox"/> Part of IPM
<input type="checkbox"/> Seasonal Concern	<input type="checkbox"/> Review Requires Less Than 4 Hours

*All*

TO BE COMPLETED BY PCB
11. DATE SENT TO HED/TSS <i>12-23-87</i>
12. PRIORITY NUMBER <i>30</i>
13. PROJECTED RETURN DATE <i>3-7-88</i>

15. INSTRUCTIONS TO REVIEWER

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

F. INSTRUCTIONS

16. RELATED ACTIONS

*3125-340*

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

<input type="checkbox"/> Use Any or All Available Information	<input type="checkbox"/> Use Only Attached Data
<input type="checkbox"/> Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.	

18. REVIEWS SENT TO

<input type="checkbox"/> TB	<input type="checkbox"/> EEB	<input type="checkbox"/> EF	<input type="checkbox"/> PL
<input checked="" type="checkbox"/> BCB	<input checked="" type="checkbox"/> EFB	<input type="checkbox"/> CH	<input type="checkbox"/> BFSD

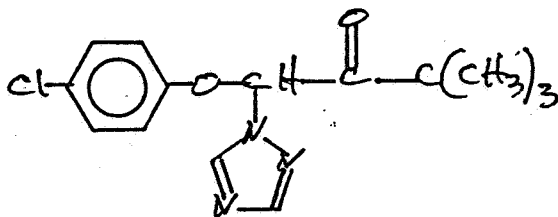
19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	<input checked="" type="checkbox"/> ENVIRONMENTAL DATA	<i>1</i>							
RD/TSS	CHEMISTRY								
	EFFICACY								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

20. <input type="checkbox"/> Label Submitted with Application Attached	21. <input type="checkbox"/> Confidential Statement of Formula	22. <input type="checkbox"/> 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.
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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 and WP in Water Soluble packets.  
Chemical Structure-



2. TEST MATERIAL: Not applicable.  
3. STUDY/ACTION TYPE: Mobay Chemical Corp is responding to a previous review (7/30/87).  
4. STUDY IDENTIFICATION: Not applicable. No new data submitted.  
5. REVIEWED BY:

Herbert L. Manning, Ph.D.  
Microbiologist  
EAB/HED

Signature: *Herbert L. Manning*  
Date: MAY 31 1988

6. APPROVED BY:

Paul Mastradone, Ph.D.  
Acting Chief, Section 1, EAB/HED

Signature: *Paul Mastradone*  
Date: MAY 31 1988

7. CONCLUSION:

EAB stated in the review of 7/30/87 that the data Mobay provided to satisfy rotational crop requirements for pea pods and vines and leafy vegetables (lettuce or spinach) were on primary crops and not rotational crops, as required. However, in their letter of 12/7/87 (attached), Mobay correctly stated that the data was on rotational crops. Mobay also applied for tolerances on residues in the pea pods and vines and leafy vegetables of rotated crops (field study).

Residues (>0.01 ppm, the limit of detection) were found in peas (0.02 ppm, 71 day interval), in pea pods (0.04 ppm, 71 day interval), and in the green vines of peas (0.59 ppm in NY, 71 day interval; 0.02 ppm in MN, ID, and WA, with plant-back intervals of 77, 73, and 73 days, respectively). No residues

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were detected in lettuce at a plant-back interval of 88 days.

In their review, RCB recommended against the proposed tolerances. Mobay responded to RCB's comments in the attached letter of 12/7/87.

8. RECOMMENDATION:

EAB defers to RCB as to the disposition of the proposed tolerances on rotated pea pods and vines. If the residue tolerances are established, the studies would not have to be repeated (for the crops with residues) to determine the no-residue, plant-back interval. If the residue tolerances are not granted, Mobay will have to either propose new residue tolerances or repeat the studies to determine the non-residue interval (must be 12 months or less).

The rotational crop data for lettuce (attached Table #21) supports a 90-day plant-back (treatment-to-planting) interval.

9. BACKGROUND:

A. Introduction- See the attached information.

B. Direction for Use- Not applicable.

10. DISCUSSION OF INDIVIDUAL STUDIES:

Not applicable.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CBI APPENDIX:

Contains supporting information.

CBI APPENDIX

Triadimefon environmental fate review

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Page \_\_\_\_\_ is not included in this copy.

Pages 7 through 14 are not included in this copy.

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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
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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.

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