

US EPA ARCHIVE DOCUMENT

DP Barcode D162644
 D162706
 :D162710 _____

PC Code :109901 _____

Date Out of EFGWB : JUL 2 1991 _____

TO: Susan Lewis/James Stone
Product Manager #21
Registration Division (H7505C)

FROM: Akiva D. Abramovitch, Ph.D., Section Chief
Environmental Chemistry Review Section #3
Environmental Fate & Ground Water Branch/EFED (H7507C)

THRU: Hank Jacoby, Chief
Environmental Fate & Ground Water Branch
Environmental Fate and Effects Division (H7507C)

Attached, please find the EFGWB review of...

Reg./File # : Submission # S393038, S393156, S393157

Chemical Name: Triadimefon (Bayleton)

Type Product : Fungicide

Product Name : BAYLETON 50% Wettable Powder/Soluble Packets

Company Name : Mobay Corp

Purpose : Review request to amend labels (2) to add
asparagus and increase yearly application rate on
grapes.

Date Received: 3/25/91 91-0466
EFGWB#: 91-0473 Time (days): 3.0

Deferrals to:

___ EEB/EFED ___ DEB/HED ___ TB1/HED
___ SIPS/EFED ___ OREB/HED ___ TB2/HED

HJ
6-28
811
1

DP BARCODE: D162710

CASE: 030030
SUBMISSION: S393157

DATA PACKAGE RECORD
BEAN SHEET

DATE: 03/21/91
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 305 TECH-LBL REV AMND DATA RE
CHEMICAL: 109901 1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-
ID#: 003125-00320 BAYLETON 50% WETTABLE POWDER FUNGICIDE
COMPANY: 003125 MOBAY CORPORATION
PRODUCT MANAGER: 21 SUSAN LEWIS 703-557-1900 ROOM: CM-2 227
PM TEAM REVIEWER: JAMES STONE 703-557-7391 ROOM: CM-2 247
RECEIVED DATE: 03/12/91 DUE OUT DATE: 06/10/91

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 162710 EXPEDITE: N DATE SENT: 03/21/91 DATE RET.: / /
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 05/05/91 CSF: N LABEL: Y
ASSIGNED TO DATE IN DATE OUT
DIV : EFED / / / /
BRAN: EFGB / / / /
SECT: / / / /
REVR : / / / /
CONTR: / / / /

* * * DATA PACKAGE REVIEW INSTRUCTIONS * * *

Is there environmental fate concerns from increased lbs. per year?

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
162708	DEB	03/21/91	05/05/91	Y	N	Y
162709	EEB	03/21/91	05/05/91	Y	N	Y
162711	FHB/PMT-21	03/21/91	05/05/91	Y	Y	Y

2

DP BARCODE: D162706

CASE: 030029
SUBMISSION: S393156

DATA PACKAGE RECORD
BEAN SHEET

DATE: 03/21/91
Page 1 of 1

*** CASE/SUBMISSION INFORMATION ***

CASE TYPE: REGISTRATION ACTION: 305 TECH-LBL REV AMND DATA RE
CHEMICAL:
ID#: 003125-00340 BAYLETON 50% WETTABLE POWDER FUNGICIDE *IN WATER-SOLUBLE Pack*
COMPANY: 003125 MOBAY CORPORATION
PRODUCT MANAGER: 21 SUSAN LEWIS 703-557-1900 ROOM: CM-2 227
PM TEAM REVIEWER: JAMES STONE 703-557-7391 ROOM: CM-2 247
RECEIVED DATE: 03/11/91 DUE OUT DATE: 06/09/91

*** DATA PACKAGE INFORMATION ***

DP BARCODE: 162706 EXPEDITE: N DATE SENT: 03/21/91 DATE RET.: / /
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 05/05/91 CSF: N LABEL: Y
ASSIGNED TO DATE IN DATE OUT
DIV : EFED *03/25/91* / /
BRAN: EFGB / / / /
SECT: / / / /
REVR : / / / /
CONTR: / / / /

*** DATA PACKAGE REVIEW INSTRUCTIONS ***

Is there environmental fate concerns from increased lbs. per year?

*** ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION ***

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
162704	DEB	03/21/91	05/05/91	Y	Y	Y
162705	EEB	03/21/91	05/05/91	Y	N	Y
162707	FHB/PMT-21	03/21/91	05/05/91	Y	Y	Y

DP BARCODE: D162644

CASE: 030030
SUBMISSION: S393038

DATA PACKAGE RECORD
BEAN SHEET

DATE: 03/20/91
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 330 TECH-NEW F/F USE AMND
CHEMICAL: 109901 1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-
ID#: 003125-00320 BAYLETON 50% WETTABLE POWDER FUNGICIDE
COMPANY: 003125 MOBAY CORPORATION
PRODUCT MANAGER: 21 SUSAN LEWIS 703-557-1900 ROOM: CM-2 227
PM TEAM REVIEWER: JAMES STONE 703-557-7391 ROOM: CM-2 247
RECEIVED DATE: 02/26/91 DUE OUT DATE: 09/04/91

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 162644 EXPEDITE: N DATE SENT: 03/20/91 DATE RET.: / /
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 07/18/91 CSF: Y LABEL: Y
ASSIGNED TO DATE IN DATE OUT
DIV : EFED 03/25/91 / /
BRAN: EFGB / /
SECT: / /
REVR : / /
CONTR: / /

* * * DATA PACKAGE REVIEW INSTRUCTIONS * * *

Is there environmental fate concerns for the proposed use of balyeton on asparagus.

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
162633	EEB	03/20/91	07/18/91	Y	Y	Y

**Agricultural Chemicals
Division**

Mobay Corporation
P.O. Box 4913
Hawthorn Road
Kansas City, MO 64120-0013
Phone: 816 242-2000

February 20, 1991

Document Processing Desk (PETN)
Office of Pesticide Programs H7504C
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: BAYLETON[®] Triadimefon, Fungicide

Dear Sir:

The undersigned, Mobay Corporation, Agricultural Chemicals Division, submits this petition pursuant to Section 408(d)(1) of the Federal, Food, Drug and Cosmetic Act with respect to the pesticide chemical 1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone and its metabolites containing the chlorophenoxy and triazole moieties (expressed as the fungicide). This petition proposes amendment of 40 CFR 180.410 by establishing tolerances for residues of BAYLETON and its metabolites in or on the raw agricultural commodity asparagus.

Attached hereto are two copies of the petition consisting of the following:

- Section A: The complete formula, setting forth the name, chemical identity, and composition of BAYLETON 50% Wettable Powder and BAYLETON 50% Wettable Powder in Water Soluble Packets.
- Section B: The amount, frequency and time of applications of BAYLETON 50% Wettable Powder and BAYLETON 50% Wettable Powder in Water Soluble Packets on asparagus are specified on the label drafts, dated 2/12/91, included in this section.
- Section C: References to full reports of investigations made with respect to the safety of 1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone are given.
- Section D: Results of tests on the amount of residue remaining, including a description of the method of analysis, are referenced in this section.

- Section E: Practical methods for removing residues that exceed the proposed tolerances are provided.
- Section F: The proposed tolerances for residues of BAYLETON in or on asparagus are presented in this section.
- Section G: Reasonable grounds in support of this petition for tolerances are provided in this section.

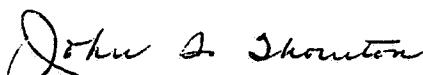
The tolerances for residues of BAYLETON in or on asparagus commodities which are proposed in the enclosed petition are more than adequate to protect the public health.

In accordance with 40 CFR 180.333, we have calculated that the required fee for this petition, based on a proposed tolerance for one commodity at a level lower than the highest previously established tolerance for BAYLETON is \$12,225.00. A cashier's check (Check No. G 0193562) in this amount payable to the U.S. Environmental Protection Agency was mailed, together with a copy of this letter to the following address:

Environmental Protection Agency
Headquarters Accounting Operations Branch
Office of Pesticide Programs (Tolerance Fees)
P.O. Box 360277M
Pittsburgh, PA 15251

Yours very truly,

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION


John S. Thornton, Manager
Registrations
Research and Development

JST:MKT:brh

Enclosures:

- (1) Pesticide Tolerance Petition (2 copies)
- (2) Mobay Report No. 100330 (3 copies)

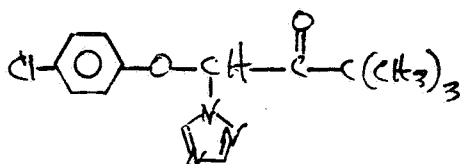
1.0 CHEMICAL:

Common Name- Triadimefon (Bayleton)

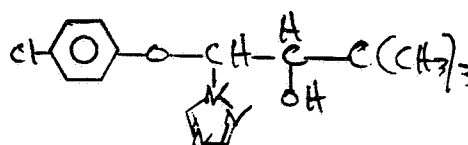
Chemical Name- 1-(4-chlorophenoxy)-
3,3-dimethyl-1-(1H-1,2,4-
triazol-1-yl)-2-butanone

Trade Name- BAYLETON 50% WP/Sol. Packets

Chemical Structure-



triadimefon



triadimenol (Baytan)

2.0 TEST MATERIAL: Not applicable.

3.0 STUDY/ACTION TYPE: The registrant is requesting an amendment to the labels (2) to add asparagus and increase application rate on grapes.

4.0 DOCUMENT IDENTIFICATION:

1. Amendment information (Section II) on proposed changes to add claims for control of rust-infecting asparagus and the grape diseases powdery mildew and black rot.

2. Letter from John Thornton of Mobay Corp. dated 20 Feb 1991 proposing the amendment.

5.0 REVIEWED BY:

Herbert L. Manning, Ph.D.
Microbiologist, EFGWB/EFED

Signature: *Herbert L. Manning*
Date: JUN 27 1991

6.0 APPROVED BY:

Akiva D. Abramovitch, Ph.D., Chief
Section 3, EFGWB/EFED

Signature: *Akiva Abramovitch*
Date: JUN 27 1991

7.0 CONCLUSION:

7.1 The EFGWB concludes that we do not have the fate data (field dissipation) to support the application rate increase (and an increase in volume of spray solution) on grapes or the addition of asparagus to the two BAYLETON labels.

8.0 RECOMMENDATION:

8.1 Inform the registrant that the EFGWB recommends they do a field dissipation study using two soils representative of grape and asparagus growing areas and a rate of BAYLETON 50% Wettable Powder equal to the highest proposed seasonal rate [24 oz/acre] to adequately define the dissipation of triadimefon and the degradate triadimenol (Baytan).

9.0 BACKGROUND:

A. Introduction- The registrant proposes increasing the application rate of triadimefon on grapes and adding asparagus to the BAYLETON 50% Wettable Powder and BAYLETON 50% Water Soluble Packets labels (see attached information). The parent is somewhat mobile ($K_{ads} = 1.8 - 6.9$, new data of 1/8/91), but not persistent ($T_{1/2} = 15$ days). The major degradate is triadimenol (Baytan), a persistent (aerobic half-life = 8-9 months) and mobile ($K_{ads} = 0.5 - 3.7$) chemical. If triadimenol migrated below the root zone and into ground water, it would be under anaerobic conditions and would be considerably more persistent ($T_{1/2} = >>8-9$ months).

B. Direction for Use- See attached information.

10.0 DISCUSSION OF PROPOSED AMENDMENTS:

Amendment to Increase Rate on Grapes-

The proposed changes in the application rate for both the wettable powder and water soluble packet formulations are attached. Of primary concern, is the increase of active ingredient from 18 oz/A to 24 oz/A in a spray solution increased from 20 gal to 50 gal.

While the active ingredient will be increased 1/3 (18 oz/A to 24 oz/A), the volume of spray solution will be increased 2.5 times (20 gal to 50 gal). This larger volume of solution would probably increase the downward movement of an extremely mobile degradate such as triadimenol (Baytan), and would be similar to the application of a pesticide just before a heavy rainfall (see Table I for a leaching assessment of triadimefon and triadimenol). The major degradate is triadimenol (Baytan), a more persistent and more mobile chemical. Our concern is the possible migration of the chemical below the root zone and into ground water, where it would be persistent ($T_{1/2} = >>8-9$ months).

The EFGWB concludes that we do not have the environmental fate data to support increases in the application rate and the volume of spray solution on grapes. A Terrestrial Field Dissipation study (using two soils representative of grape growing areas and a rate of BAYLETON 50% Wettable Powder equal to the proposed new seasonal rate [24 oz/acre]) is needed to adequately define the dissipation of triadimefon and the degradate triadimenol (Baytan).

Amendment to Add Asparagus

The proposal to add asparagus to the labels (BAYLETON 50% Wettable Powder/Water Soluble Packets) is also related to the field dissipation of the parent triadimefon and the degradate triadimenol, since the cultural practice for growing asparagus involves a ditch about 18 inches deep containing a light, sandy soil. This would enhance the downward movement of a leachable pesticide such as triadimefon and its degradate triadimenol.

Again, the EFGWB concludes that we do not have the data to support this label addition, and recommend a field dissipation study as described above.

The EFGWB is aware that the registrant recently submitted a field dissipation study (1990, MRID #41717501); however, the study only concerned the degradate triadimenol (BAYTAN), not the parent, and cannot be used to support the amendments on grapes and asparagus that will be treated with the parent in the BAYLETON 50% Wettable Powder/Water Soluble Packets formulations. The new field dissipation study will be reviewed when Phase V of FIFRA '88 is implemented.

11.0 COMPLETION OF ONE-LINER: Not applicable.

12.0 CBI APPENDIX: There is no CBI in this review.

TABLE 1
LEACHING ASSESSMENT FOR TRIADIMEFON

Property	Bayleton ¹	Baytan ²	Guidelines ³
Adsorption Partition Coefficient	3.5 - 9.3	0.5 - 3.7	<5.0, <1.0 or 2.0
Solubility (ppm)	70 @ 20° C	49 - 95° C >30 ppm	
Hydrolysis half-life	relatively stable	stable	>25 weeks
Photolysis half-life	stable soil <1 day aqueous	stable soil 36 hr aqueous	>1 week
Aerobic Soil half-life	6-18 days	8-9 months	>2-3 weeks
Anaerobic Soil half-life	15 days	>>8-9 months	>2-3 weeks

¹EFGWB Pesticide Environmental Fate One Line Summary, 6/22/89.

²EFGWB Pesticide Environmental Fate One Line Summary, 1/27/84.

³Cohen, S.Z., S.M. Creeger, R.F. Carsel, and C.G. Enfiel, "Potential Pesticide Contamination of Groundwater from Agricultural Uses, in Treatment and Disposal of Pesticide Wastes", ACS Symposium Series #259, R.F. Krueger and J.N. Seiber, ed., American Chemical Society, Washington, D.C., 1984.



United States Environmental Protection Agency
Office of Pesticide Programs (TS-757)
Washington, DC 20460

OPP Identifier Number

141574

Application for Pesticide: Registration Amendment

Section I

1. Company/Product Number 3125-320	2. Date March 5, 1991	3. Product Manager Susan Lewis (21)	4. Proposed Classification <input type="checkbox"/> General <input type="checkbox"/> Restricted
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5. Name and Address of Applicant (Include ZIP Code)

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION
P. O. Box 4913
Kansas City, Missouri 64120

Check if this is a new address

6. Product Name
BAYLETON[®] 50% Wettable Powder

Section II - Amendment Information

1. Subject <input type="checkbox"/> Resubmission in response to Agency letter <input type="checkbox"/> Final printed label in response to Agency letter <input checked="" type="checkbox"/> Other (explain below)	Date of Letter
--	----------------

See Attached

Section III

1. Material This Product Will Be Packaged In		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit package wgt. No. per container	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Package weight No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container		
5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On material accompanying product		6. Manner in Which Label is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other (Specify)	

Section IV

1. Contact Point (Contact person directly below for identification of individual to be contacted, if necessary, to process this application).

Name
John S. Thornton

Title
Manager, Registrations

Telephone No. (Include Area Code)
(816) 242-2255

6. Date of Application Received (Stamped)

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by imprisonment or both under applicable law.

2. Signature
John S. Thornton

3. Title
Manager, Registrations

4. Typed Name
John S. Thornton

5. Date Signed
3/5/91

RIN 5712-93

PC 109901 TRIADINEFON REVIEW

Page is not included in this copy.

Pages 12 through 15 are not included.

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 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.



United States Environmental Protection Agency
Office of Pesticide Programs (TS-757)
Washington, DC 20460

GPP Identifier Number

141575

Application for Pesticide: Registration Amendment

Section I

1. Company/Product Number 3125-340	2. Date March 5, 1991	3. Product Manager Susan Lewis (21)	4. Proposed Classification <input type="checkbox"/> General <input type="checkbox"/> Restricted
---------------------------------------	--------------------------	--	--

5. Name and Address of Applicant (include ZIP Code)

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION
P. O. Box 4913
Kansas City, Missouri 64120

Check if this is a new address

6. Product Name
BAYLETON[®] 50% Wettable Powder in Water Soluble Packets

Section II - Amendment Information

1. Subject <input type="checkbox"/> Resubmission in response to Agency letter <input type="checkbox"/> Final printed label in response to Agency letter <input checked="" type="checkbox"/> Other (explain below)	Date of Letter
See Attached	

Section III

1. Material This Product Will Be Packaged In		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit package wgt No. per container	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Package weight No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container		
5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On material accompanying product		6. Manner in Which Label is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted. Necessary to process this application).

Name
John S. Thornton

Title
Manager, Registrations

Telephone No. (include Area Code)
(816) 242-2255

6. Date Application Received (Date)
3/5/91

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature
John S. Thornton

3. Title
Manager, Registrations

4. Typed Name
John S. Thornton

5. Date Signed
3/5/91

RIN 5712-93

PC 109901 TRIADIMEFON REVIEW


Page is not included in this copy.

Pages 17 through 20 are not included.

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 quality control procedures.
- Identity of the source of product ingredients.
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- The product confidential statement of formula.
- Information about a pending registration action.
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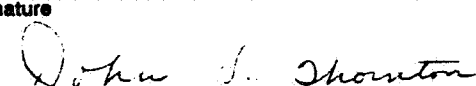
 United States Environmental Protection Agency Office of Pesticide Programs (TS-767) Washington, DC 20460	OPP Identifier Number 141496
Application for Pesticide: <input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment	

Section I			
1. Company/Product Number 3125-320	2. Date February 20, 1991	3. Product Manager Susan Lewis (21)	4. Proposed Classification <input type="checkbox"/> General <input type="checkbox"/> Restricted
5. Name and Address of Applicant (Include ZIP Code) MOBAY CORPORATION AGRICULTURAL CHEMICALS DIVISION P. O. Box 4913 Kansas City, Missouri 64120			
<input type="checkbox"/> Check if this is a new address			

6. Product Name BAYLETON 50% Wettable Powder

Section II - Amendment Information	
1. Subject <input type="checkbox"/> Resubmission in response to Agency letter <input type="checkbox"/> Final printed label in response to Agency letter <input checked="" type="checkbox"/> Other (explain below)	Date of Letter
See Attached	

Section III			
1. Material This Product Will Be Packaged In		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit package wgt. No. per container	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Package weight No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container	
5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On material accompanying product		6. Manner in Which Label is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

Section IV		
1. Contact Point (Complete the following for identification of individual to be contacted, if necessary, to process this application).		
Name John S. Thornton		
Title Manager, Registrations		Telephone No. (include Area Code) (816) 242-2255
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 		3. Title Manager, Registrations
4. Typed Name John S. Thornton		5. Date Signed 2/20/91
8. Date Application Received (Stamped)		

BAYLETON® 50% Wettable Powder
EPA Reg. No. 3125-320

Section II - Amendment Information

With the enclosed draft labeling, dated 2/12/91, we are proposing to add claims for control of rust infecting asparagus. This application is being submitted along with a petition to establish a tolerance of 0.06 ppm for residues of BAYLETON and its metabolites containing chlorophenoxy and triazole moieties on the raw agricultural commodity asparagus.

We request that the Agency waive the requirement of efficacy data for this application in accordance with the statutory authority conveyed by FIFRA, as amended.

Included with this application is a completed Certification with Respect to Citation of Data/General Offer to Pay form in compliance with PR Notice 85-3. The most recent data submitters list, dated March 1990, shows that Mobay is the only data submitter for BAYLETON (Chemical 109901).

If, during the course of the Agency's review of this application, pertinent comments or questions arise, we would like to receive a copy of the actual review notes. Having a copy of the actual notes aids us in formulating timely replies to the Agency.

RIN 5712-93

PC 109901 TRIADIMEFON REVIEW

Page 23 is not included in this copy.

Pages _____ through _____ are not included.

The material not included contains the following type of information:

- Identity of product inert ingredients.
- Identity of product impurities.
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- Description of quality control procedures.
- Identity of the source of product ingredients.
- Sales or other commercial/financial information.
- A draft product label.
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- The document is a duplicate of page(s) _____.
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United States Environmental Protection Agency
Office of Pesticide Programs (TS-767)
Washington, DC 20460

OPP Identifier Number

141497

Application for Pesticide: Registration Amendment

Section I

1. Company/Product Number 3125-340	2. Date February 20, 1991	3. Product Manager Susan Lewis (21)	4. Proposed Classification <input type="checkbox"/> General <input type="checkbox"/> Restricted
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5. Name and Address of Applicant (Include ZIP Code)

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION
P. O. Box 4913
Kansas City, Missouri 64120

Check if this is a new address

6. Product Name
BAYLETON 50% Wettable Powder in Water Soluble Packets

Section II - Amendment Information

1. Subject <input type="checkbox"/> Resubmission in response to Agency letter <input type="checkbox"/> Final printed label in response to Agency letter <input checked="" type="checkbox"/> Other (explain below)	Date of Letter
See Attached	

Section III

1. Material This Product Will Be Packaged In		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit package wgt. No. per container	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Package weight No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container		
5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On material accompanying product		6. Manner in Which Label is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).

Name: John S. Thornton

Title: Manager, Registrations

Telephone No. (Include Area Code): (816) 242-2255

6. Date Application Received (Stamped)

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature: *John S. Thornton*

3. Title: Manager, Registrations

4. Typed Name: John S. Thornton

5. Date Signed: 2/20/91

BAYLETON® 50% Wettable Powder in Water Soluble Packets
EPA Reg. No. 3125-340

Section II - Amendment Information

With the enclosed draft labeling, dated 2/12/91, we are proposing to add claims for control of rust infecting asparagus. This application is being submitted along with a petition to establish a tolerance of 0.06 ppm for residues of BAYLETON and its metabolites containing chlorophenoxy and triazole moieties on the raw agricultural commodity asparagus.

We request that the Agency waive the requirement of efficacy data for this application in accordance with the statutory authority conveyed by FIFRA, as amended.

Included with this application is a completed Certification with Respect to Citation of Data/General Offer to Pay form in compliance with PR Notice 85-3. The most recent data submitters list, dated March 1990, shows that Mobay is the only data submitter for BAYLETON (Chemical 109901).

If, during the course of the Agency's review of this application, pertinent comments or questions arise, we would like to receive a copy of the actual review notes. Having a copy of the actual notes aids us in formulating timely replies to the Agency.

RIN 5712-93

PC 109901 TRIADINEFON REVIEW

Page 26 is not included in this copy.

Pages _____ through _____ are not included.

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 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.