

US EPA ARCHIVE DOCUMENT

323EE

Date Out EFB:
DEC 16 1982

To: Jacoby
Product Manager 21
Registration Division (TS-767)

From: Emil Regelman, (Acting) Chief
Review Section No. 1
Environmental Fate Branch
Hazard Evaluation Division (TS-769)

Q COPY

Attached please find the environmental fate review of:

Reg./File No: 100-AUR

Chemical: CGA-64250

Type Product: Fungicide

Product Name: BANNER

Company Name: Ciba-Geigy

Submission Purpose: new product on turf

ZBB Code: other

ACTION CODE: 175

Date in: 10/6/82

EFB # 4

Date completed: 12/16/82

Tais (level II) Days

63

2.0

Deferrals To:

Ecological Effects Branch

Residue Chemistry Branch

Toxicology Branch

1.0 INTRODUCTION

Ciba-Geigy Corporation has submitted a label for the registration of a new use pattern of CGA-64250 (1-(2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl)methyl)-1H-1,2,4-triazole) on turf. No new EC data has been submitted. CGA-64250, formulated as Tilt®, is registered for a terrestrial non-food use on grass grown for seed.

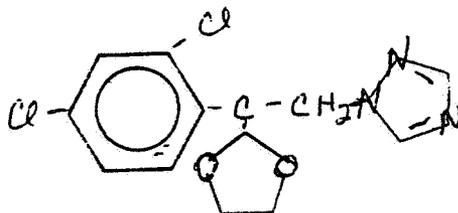
2.0 CHEMICAL IDENTITY

Chemical name: 1-(2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl)methyl)-1H-1,2,4-triazole

Product name: Banner

Company code number: CGA-64250

Structure:



3.0 DIRECTIONS FOR USE

See attached proposed label.

4.0 DISCUSSION

This use of 4 oz./1000 ft.² of a 1.1 lb ai/gal formulation results in an application rate of 1.5 lb ai/A. The previous registration was for the use of 0.5 pt/A of a 3.6 lb ai/gal formulation which resulted in an application rate of 0.225 lb ai/A. This is a significant difference in application rates for a similar use. No explanation is offered for this difference.

We also note that no field dissipation study has been submitted for CGA-64250. In lieu of this study, the soil dissipation half-life of 10 weeks was taken as reflecting the field dissipation. This indicates that CGA-64250 is a persistent chemical which may build up on repeated application and repeated applications are allowed for this use. EFB deferred to EEB on 6/17/81 relative to the potential significance of this persistence.

5.0 CONCLUSIONS

1. Hydrolysis, soil and water photolysis, adsorption/desorption, leaching, aerobic and anaerobic soil metabolism, and fish accumulation data requirements have been satisfied for CGA-64250.
2. No rotational crop data have been provided. It is assumed that turf use will not involve rotation to food or feed crops.
3. This use involves a significantly higher application rate than the previous registration (1.5 lb ai/A vs. 0.225 lb ai/A).
4. The field dissipation study data requirement has still not been satisfied.

6.0 RECOMMENDATIONS

1. EFB cannot concur with the proposed label amendment.
2. The registrant should submit the requisite field dissipation study at the higher proposed application rate.

Norma Kay Whetzel

Norma Kay Whetzel
December 16, 1982
Review Section No. 1
Environmental Fate Branch
Hazard Evaluation Division

TILT CGA-64250 Reviews

The next 6 page(s) is/are not included in this copy of the TILT reviews.

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
 - Detailed methods and results of a registrant submission.
 - Duplicate pages.
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The information not included generally is considered confidential by product registrants. If you wish to obtain the information deleted, please contact the individual who prepared this response to your request.
