6-12-84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 12 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: FL-840013. Section 24(c) Registration for the use of Bayleton on sugarcane grown for seed.

FROM: Sami Malak, Chemist
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Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, P.h.D., Cheif
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TO: Henry M. Jacoby, PM #21
Fungicide - Herbicide Branch
Registration Division (TS-767)

The State of Florida requests a Section 24(c) registration for the fungicide, Bayleton, on sugarcane grown for seed. Bayleton is currently registered for use on several crops (EPA Reg No. 3125-320).

Permanent tolerances are established for the combined residues of the fungicide 1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazolyl)-2-butanone and its metabolite beta - (4-chlorophenoxy) -alpha(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol in or on several plant and animal commodities (except sugarcane) at levels or from 0.04 to 145 ppm (40 CFR 180.410). A tolerance of 1.0 ppm for residues of Bayleton in or on sugarcane is in reject status because of residue considerations (PP#3E2938, Memo of R. Cook 1/27/84).

For control of smut disease in sugarcane grown for seed, the proposed use calls for dipping the seed pieces of sugarcane prior to planting for a period of 5 minutes in a suspension containing 0.21 - 0.42 lb act/100 gallons of water.

Because of the systemic nature of Bayleton and the occurrence of residues in or sugarcane resulting from soil applications (PP#3E2938), we consider the proposed use a food/feed use requiring the establishment of appropriate tolerances. In order for the proposed seed treatment to be considered a non-food use, data from a radiotracer study would have to be submitted showing no uptake of residues (activity) from treated seed cuttings or sugarcane into the aerial portion of first year crop.

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Conclusions

1. The proposed use is a food/feed use requiring the establishment of appropriate tolerances for residues of Bayleton in or on sugarcane. No tolerances for residues of Bayleton in or on sugarcane have been established.

2. In order for the proposed seed treatment to be considered a non-food use, data from a radiotracer study must be submitted showing no uptake of residues (activity) from treated seed cuttings of sugarcane into the aerial portion of first year crop.

Recommendation

We recommend against this Section 24(c) registration for the reason listed in Conclusion 1 above.

cc: Section 24(c)S.F., Bayleton, R.F. Circu., Reviewer
RDI: E. Zager:6/7/84: R.Schmitt: 6/7/84.
TS-769:RCB:S.MALAK:bj:CM#2:RM-810:X777377: 6/8/84