

FILE COPY

Date Out EFB: JUL 16 1982

To: Product Manager 21 Jacoby
TS-767

From: Samuel M. Creeger
Acting Chief, Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 3125-320

Chemical: Bayleton

Type Product: Fungicide

Product Name: Bayleton

Company Name: Mobay

Submission Purpose: Reentry data

ZBB Code: other

ACTION CODE: 336

Date in: 5/10/82

EFB # 318

Date Completed: JUL 16 1982

TAIS (level II) Days

Deferrals To:

Ecological Effects Branch

Residue Chemistry Branch

Toxicology Branch

REVIEW OF BAYLETON REENTRY DATA

Background:

This data was submitted as a result of a phone call from Mr. G. E. Brussell, Mobay. At that time he wanted to know if we were going to require a reentry study on Bayleton because they wanted to start any required studies this year. I said that we would defer to Tox Branch for their evaluation of the toxicological need for protection of farmworkers from residues of Bayleton. He then said that he would submit data to the Agency, and that he wanted to know if any further testing would be required. That data had been submitted to the State of California to satisfy State requirements for reentry protection for Bayleton.

Data:

There are several pieces in this data-submission package including a soil residue dissipation study; a foliar dislodgeable residue dissipation study; the supporting chemical procedures for determination of residue levels; an exposure study for mixers, loaders, and applicators; and a proposed label.

The studies on recovery and quantitation of Bayleton dislodgeable residues are appropriate and acceptable.

The submitted soil dissipation study would not be required under Guidelines Subdivision K. Such a study is only required for the establishment of a reentry interval where workers could be exposed to large amounts of soil bound residues.

The foliar dislodgeable dissipation study is appropriate and acceptable. The graph of the data shows that the dissipation of Bayleton residues is not rapid. However, the residue levels are relatively low.

The mixer/loader/applicator exposure study is only important for this review because there are data in it which relate to the dermal absorption of Bayleton, and dermal absorption data are used to calculate a reentry interval. Tox Branch should review this part of the data if Mobay intends to propose its use for calculation of a reentry interval according to the method of Guidelines Subdivision K.

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Recommendations/Conclusions:

That part of the proposed label which states:

"NOTE: BAYLETON 50% WP may be
applied up to day of harvest."

is unacceptable until the issue of a reentry interval for Bayleton on grapes and apples is resolved. As it reads, the label implies that fruit may be hand-harvested on the same day as application of Bayleton.

No further Bayleton dissipation or reentry exposure studies should be required by the Agency if Mobay is willing to propose a Federal reentry interval based on this data. The Agency method for estimation of a reentry interval is detailed in Guidelines Subdivision K, but a reentry interval proposed by California State methodology could also be used.

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