7-19-82

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

MEMORANDUM

JUL 19 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-ID-10. Proposed Section exemption for the use of triadimefon (Bayleton) on sugar beets in Idaho

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Edward Zager

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

CT

TO: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our previous review of this Section 18 exemption (E. Zager 7/6/82) we recommended against the proposed Section 18 exemption for the use of Bayleton on sugar beets in Idaho due to the lack of residue data for sugar beets and the processed commodities derived from sugar beets reflecting the proposed use.

The current submission contains results of two residue trials conducted in Arizona. Bayleton was applied broadcast or in a two inch band over the crowns at the rate of 8 oz act/A (2x the maximum proposed application rate). Residues of Bayleton and its metabolite KWG0519 ranged from <0.01 ppm - 0.02 ppm in sugar beet roots and, 0.01 ppm - 0.09 ppm in sugar beet tops at PHI's of 15-30 days.

As only trace residues will be present in roots, we would not expect a significant concentration of residues in going from sugar beets to the processed fractions dried pulp, sugar and molasses.

We thus etimate that residues of Bayleton and its metabolite KWG0519 will not exceed 0.1 ppm in or on sugar beets roots, sugar beet tops, dried sugar beet pulp, sugar and molasses as a result of the proposed use.

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Meat, Milk, Poultry and Eggs

Feeding studies were discussed in our review of FAP#1H5282 and at that time we concluded that the apple and grape uses would fall under Category 2 of 180.6(a). Thus in conjunction with those uses which would result in a dietary burden of approximately 2 ppm we recommended for the establishment of a temporary 0.01 ppm tolerance for residues of Bayleton and its metaboite KWG0519 in milk, eggs and the meat, fat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep. The use proposed here will not contribute significantly to the existing dietary burden. Therefore, it is our judgement that the above meat, milk, poultry and egg tolerances will be adequate to cover any secondary residues resulting from the proposed use.

Conclusions

1. Residues of Bayleton and its metabolite KWG0519 will not exceed 0.1 ppm in or on sugar beet roots, sugar beet tops, dried sugar beet pulp, sugar and molasses as a result of the proposed use.

2. Secondary residues of Bayleton and KWG0519 in milk, eggs and the meat, fat and meat byproducts of cattle, goats hogs, horses, poultry and sheep will not exceed the established 0.01 ppm temporary tolerance.

Recommendation

TOX considerations permitting we have no objections to the granting of this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated sugar beets in commerce.

cc: Bayleton S.F.
Section 18 S.F.
R.F.
Circu
Reviewer
TOX

RDI:Section Head:RJH:Date:7/15/82:RDS:Date:7/15/82
TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM:#2:RM:810:Date:7/15/82