R.F. 4-21-89

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

APR 21 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 89-CA-16 (Revised). Section 18 Specific Exemption. Triadimefon (Bayleton) on Tomatoes (Fresh Market and Processing). No MRID #. DEB # 5224.

FROM: Leung Cheng, Chemist
Special Registration Section II
Dietary Exposure Branch
Health Effects Division (H7509C)

THRU: Francis Suhre, Acting Section Head
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: D. Stubbs/L. Pemberton, PM Team 41
Emergency Response and Minor Use Section
Registration Support Branch
Registration Division (H7507C)

and

Toxicology Branch
Health Effects Division (H7509C)

The Dietary Exposure Branch has been asked to review a revised use pattern in connection with a Section 18 specific exemption requested earlier for the use of the fungicide Bayleton (active ingredient triadimefon) on tomatoes (89-CA-16, L. Cheng, 4/7/89).

The revised proposed Section 18 calls for a maximum of 2 applications at 1-2.5 oz ai/A in 20 or more gallons of water by ground or aerial equipment. A PHI of 30 days would be in effect. The previously proposed use allowed up to 8 applications in one season and a PHI of 1 day.

Tomato residue data generated in California showed a steady decline on total residues of triadimefon as a function of time. Following 3 or 4 applications at 2.5 oz ai/A, residues were 0.04 ppm and 0.08 ppm (0 day after last treatment), 0.02 ppm (3 days), and $\leq$0.01 ppm (7 days). Controls had <0.01 ppm residues.

On the basis of the above data, DEB expects the combined residues of triadimefon in or on tomatoes to be negligible as a result of the revised proposed use. Likewise, residues in or on processed tomato products would be negligible.

Consequently, the established meat and milk tolerances would not be exceeded as a result of the revised proposed use.

Methods I and II, as described in the Pesticide Analytical Manual, are adequate for enforcement purposes.

CONCLUSIONS

1. The metabolic nature of triadimefon in tomatoes and animals is adequately understood. The residues of concern consist of the parent compound and its metabolites containing the chlorophenoxy and triazole moieties.

2. The combined residues of triadimefon and its metabolites in or on tomatoes and tomato processed products are expected to be negligible (<0.01 ppm) as a result of the revised Section 18 (89-CA-16) proposed use.

3. The established meat and milk tolerances will not be exceeded as a result of the revised Section 18 (89-CA-16) proposed use.

4. Methods I and II, as described in the Pesticide Analytical Manual, are adequate for enforcement purposes.

5. Reference standards of triadimefon are available from the Pesticides and Industrial Chemicals Repository at RTP, NC.

RECOMMENDATION

TOX considerations permitting, DEB has no objections to this revised Section 18 exemption request provided the label is amended to reflect a maximum of 2 applications (2.5 oz ai/A per application) and a PHI of 30 days.

cc:Circ, RF, Section 18 F, Tomerlin (SACB), Cheng, Schmitt (DEB Acting Chief), PMSD/ISB
RDI:FSuhre:4/20/89:EZager:4/20/89
H7509:DEB:CM#2:Rm810:Cheng:4/20/89:1:4/21/89