8-23-82

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

AUG 23 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: 82-CA-93 Proposed Section 18 exemption for the use of Bayleton on sugar beets in California

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

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

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The California Department of Food and Agriculture requests a Section 18 exemption for the use of Bayleton 50% wettable Powder (triadinefon) to control powdery mildew on sugar beets.

The proposed use would permit a single application at the rate of 8 oz act/A in a minimum of 5 gallons of water per acre by air and a minimum of 60 gallons of water per acre by ground equipment with a 35 day PHI.

Residue data reflecting applications of Bayleton to sugar beets were submitted in connection with the Section 18 exemption for a similar use (0.5 x the rate proposed here) in Idaho. Bayleton was applied broadcast or in a two inch band over the crowns at the rate of 8 oz act/A (1x the 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.

1/2

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 estimate 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.

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 metabolite 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