



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

R.F.
2-23-90
CONFIDENTIAL

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FEB 23 1990

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MEMORANDUM (CONFIDENTIAL)

SUBJECT: Product Chemistry Data Review for Technical Triadimefon to Determine the Potential for Halogenated Dibenzop-dioxin/Dibenzofuran Formation. I. D. No. 3125-318. Record No. 256231. MRID No. 40477400. DEB No. 6101

FROM: Stephen Funk, Chemist
Special Registration Section I
Dietary Exposure Branch
Health Effects Division (H7509C) *S. Funk*

THRU: Andrew Rathman, Section Head
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TO: E. Feris, PM 74
Special Review/
Reregistration Division (H7508C)

Background

In response to a DCI of 06/09/87, Mobay Corporation, Agricultural Chemicals Division, Kansas City, MO submitted (Mobay Reference 258092, 12/11/87, received 01/19/88) manufacturing data for technical 90% triadimefon (bayleton), or 1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone. The registrant claims CBI status for the information supplied. The purpose of the DCI is to acquire information on the potential for formation of halogenated dibenzo-p-dioxin or dibenzofuran contaminants during certain manufacturing processes. Three specific types of information were requested (Pesticide Assessment Guidelines, Subdivision D, Sections 61-1, 61-2, and 61-3):

1. Product identity and ingredients.
2. Description of beginning materials and manufacturing process.
3. Discussion of the formation of impurities.

TRIADIMEFON (BAYLETON)

Page _____ is not included in this copy.

Pages 2 through 6 are not included.

The material not included contains the following type of information:

____ Identity of product inert ingredients.

____ Identity of product impurities.

☒ Description of the product manufacturing process.

☒ Description of quality control procedures.

____ Identity of the source of product ingredients.

____ Sales or other commercial/financial information.

____ A draft product label.

____ The product confidential statement of formula.

____ Information about a pending registration action.

____ FIFRA registration data.

____ The document is a duplicate of page(s) _____.

____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

Recommendation

DEB recommends that analytical chemistry data on halogenated dibenzo-p-dioxin/dibenzofuran contaminants in triadimefon not be required. Dioxins/dibenzofurans are not likely to form under the manufacturing conditions presented by Mobay Corporation.

cc: Dioxin SF, RF, R. Schmitt (Branch Chief), Funk, Eldredge
(PMSD, ISB).

RDI:A. Rathman:02/16/90:E. Zager:02/16/90:

H7509C:DEB:S. Funk:557-1439:CM#2:Rm803-A:SF (DIOX.25):01/30/90