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

MAY 24 1983

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 83-CA-59. Section 18 request for triadimefon (Bayleton) on caneberries.

FROM: Richard Loranger, Chemist R. Loranger
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Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
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TO: Donald Stubbs, Product Manager
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Registration Division (TS-767)

and
Toxicology Branch
Hazard Evaluation Division (TS-769)

A Section 18 exemption for the use of triadimefon (Bayleton) on caneberries has been requested by the California Department of Food and Agriculture.

For control of powdery mildew the caneberries are to receive 2 oz ai/A (Bayleton 50WP formulation) as needed at 4-6 week intervals with a maximum of 4 applications in one year. A 3 day preharvest interval is proposed. The program will start in mid-June with 800 acres being critically affected by the disease.

We have previously concluded that the residue of concern for Bayleton on fruits consists of the parent compound and its metabolite KWG0519 (A. Smith, 6/12/81, PP#1F2474). The conjugates of those components comprise only a minor portion of the residue in fruits (even though they are significant on grasses).

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224

Only one field trial is available for Bayleton on caneberries. Six treated samples of raspberries were analyzed for parent and KWG0519. None of these reflect the proposed use. Two samples harvested on the day of application (2 oz ai/A) contained 0.476 and 0.535 ppm total residues. The other samples were collected 7 days and 16 days following 2 applications of 3 oz ai/A. Residues at these 2 intervals were 0.223-0.289 ppm and 0.098-0.123 ppm, respectively.

Although the above study is not by itself sufficient to predict a likely maximum residue level, ten trials on grapes are reported in PP#'s 0G2300 and 1F2474. We consider these studies applicable since grapes and the various caneberries both fall under the "small fruits and berries" group of the proposed crop grouping scheme. For samples which received 2-3 applications of 3 oz ai/A total residues at 0-1 day and 6-7 days were <0.02-1.55 ppm and <0.02-1.40 ppm, respectively. Therefore, considering that residues could be slightly higher on caneberries than on grapes, we conclude that 2 ppm is a reasonable maximum residue to be expected from the proposed use (3 day PHI, up to 4 applications of 2 oz ai/A).

Since caneberries are not fed to livestock, there will be no secondary residues of triadimefon in meat, milk, poultry and eggs as a result of this emergency use.

Conclusions and Recommendation

1. Total residues of triadimefon and its metabolite KWG0519 on caneberries could range up to 2 ppm from the proposed emergency use.

2. There will be no residues in meat, milk, poultry and eggs as a result of this use.

TOX considerations permitting we have no objections to this Section 18 exemption. An agreement with FDA is needed concerning the legal status of treated caneberries in commerce.

cc: R.F., Circu, Loranger, Bayleton Section 18 and S.F., TOX
RDI:Section Head:RJH:Date:5/23/83:RDS:Date:5/23/83
TS-769:RCB:Reviewer:R.Loranger:LDT:557-7324:CM#2:RM:810:Date:5/23/83