5-29-81

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

MAY 29 1981

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP2G2432. Bayleton on wheat and barley. Comments on the amendment of April 14, 1981.

FROM: John M. Worthington, Chemist
Residue Chemistry Branch (TS-769)

TO: Henry Jacoby, PM, Team 21, Registration Division (TS-767)
and Toxicology Branch (TS-769)

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

The petitioner was informed by Registration Division's letter of 3/20/81 of the following requirements for a favorable recommendation (See also our memo of 2/25/81):

1. Inclusion of straw in the label restriction against the feeding or grazing of treated forage and fodder.

2. Either the submission of appropriate residue data for barley, or deletion of the proposed tolerance for barley from Section F and the use on barley from Section B and the EUP.

The petitioner has revised Section B to include straw in the label restriction against the feeding or grazing of treated forage and fodder. Therefore, we can consider Requirement #1 satisfied.

The petitioner has also revised Section B to delete the use on barley and Section F to delete the tolerance proposal for Bayleton residues on barley. Therefore, we can consider Requirement #2 satisfied.

Conclusion and Recommendations

1. We now consider the requirements cited in our original review satisfied.

2. Toxicological considerations permitting, we can now recommend for the proposed temporary tolerance for residues of Bayleton, [1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2- butanone] and its metabolite, -(4-chlorophenoxy)- -(1,1-dimethylethyl) -1H-1,2,4-triazol-1-ethanol (KWG 0519) in or on wheat grain at 0.1 ppm.

3. We also reiterate the requirements for a future permanent tolerance:

   a) A more detailed description of the manufacturing process indicating the solvent medium, the base used, and any other significant reaction parameters

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b) Deletion of the label restriction against the feeding or grazing of treated forage, fodder, and straw; the proposal of appropriate tolerances for these comodities; and the submission of supporting residue data.

c) Submission of additional recovery data from samples of both wheat and barley fortified at 0.1 ppm that show significantly less variation.

d) A wheat or barley metabolism study.

e) Inclusion of the animal metabolites, KWG 0519 acid, KWG 1342, and KWG 1323 in the tolerance expression for meat, milk, poultry and eggs. Therefore, appropriate analytical methodology and validation data for both the free and conjugated forms of the metabolites; bovine and poultry feeding data reflecting the levels of the above metabolites in meat, milk, poultry and eggs; and possibly the proposal of higher tolerance levels.

f) Poultry feeding data reflecting the levels of Bayleton, per se, and KWG 0519 in eggs and poultry tissues.

g) Additional wheat residue data reflecting the residue levels that will result from the low volume aerial applications.

h) Submission of appropriate methodology, validation data and residue data to determine residue levels in milling fractions.

cc: Reading file
Circu
Reviewer
FDA
TOX
EEB
EFB
PP# NO. 2G2432
Randy Watts

TS-769:Reviewer:JMWorthington:LDT:X77324:CM#2:RM:810:Date:5/28/81
RDI:Section Head:RHJ:Date:5/22/81:RDS:Date:5/26/81