

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

3-30-83

MAR 8 0 1983

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

#### MEMORANDUM

SUBJECT: 83-NJ-14. Proposed Section 18 exemption for the

use of Bayleton on asparagus in N.J.

M: Lower R. Loranger Chemist

Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

TO: Emergency Response Section

Registration Division (TS-767)

and

Toxicology Branch, HED (TS-769)

THRU: Charles L. Trichilo, Chief

Residue Chemistry Branch Hazard Evaluation Division (TS-769)

The New Jersey Department of Environmental Protection requests a Section 18 exemption for the use of Bayleton 50 WP (50% tradimefen) to control asparagus rust on asparagus.

The proposed use calls for 4 applications at the rate of 1 oz. act/A with a PHI of about 6 months. It is estimated that 1,500 acres will be treated between July 1, 1983 and October 1, 1983.

The metabolism of Bayleton in plants was discussed in our review of PP#0G2300 (memo of J. Worthington, April 10, 1980). For the purpose of this Section 18 use we consider the residue of concern to be Bayleton and its metabolite KWG 0519 ( $\beta$ -(4-chlorophenoxy)-  $\ll$  -(1,1-dimethyl-ethyl)-1H-1,2,4-triazol-l-ethanol.

No residue data reflecting this use are available. However, taking into consideration the rapid dissipation of Bayleton residues (see for example PP#0F2393, Bayleton on

Y2

cucumbers), the low application rate and long PHI, we estimate that residues of Bayleton and its metabolite KWG0519 will not exceed 0.1 ppm in or on asparagus as a result of the proposed use.

## Meat, Milk, Poultry and Eggs

There are no livestock feed items involved in this use and consequently no problem with secondary residues in meat, milk, poultry and eggs.

## Conclusions

- 1. Residues of Bayleton and its metabolite KWG 0519 will not exceed 0.1 ppm in or on asparagus as a result of the proposed use.
- 2. There will be no problem with secondary residues of Bayleton in meat, milk, poultry and eggs from this use.

### Recommendation

TOX considerations permitting, we have no objections to the issuance of this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated commodity in commerce.

cc: Bayleton SF, Sect 18 SF R.F. Circu Reviewer Subject File

Section 18, S.F.
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