

Shaghnessy No.: 109901

Date Out of EAB: MAY 31 1988

To: Lois Rossi  
Product Manager # 21  
Registration Division (TS-767)

From: Paul Mastradone, Ph.D., Acting Chief  
Environmental Chemistry Review Section  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769-C)

THRU: Paul F. Schuda, Ph.D., Chief  
Exposure Assessment Branch/HED (TS-769C)

Attached, please find the EAB review of...

Reg./File # : 3125-320 and 3125-340

Chemical Name: Triadimefon

Type Product : Fungicide

Product Name : BAYLETON 50% Wettable Powder and 50% WP in Water Soluble Packets

Company Name : Mobay Chemical Corp

Purpose : Review registrant's response to previous review of July 30,  
1987.

Date Received: 12/23/87

Action Code: 335, 336

Date Completed: \_\_\_\_\_

EAB #(s): 80266, 80267

Monitoring study requested: \_\_\_\_\_

Total Reviewing Time: 2.0 days

Monitoring study voluntarily: \_\_\_\_\_

Deferrals to : \_\_\_\_\_ Ecological Effects Branch

☒ \_\_\_\_\_ Residue Chemistry Branch

\_\_\_\_\_ Toxicology Branch

# REGISTRATION DIVISION DATA REVIEW RECORD

Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

11ED  
12-23-87

CHEMICAL NAME

*BAILLTON*

*44105*

2. IDENTIFYING NUMBER <i>3125-310</i>	3. ACTION CODE <i>334</i>	4. ACCESSION NUMBER <i>—</i>	TO BE COMPLETED BY PM
			5. RECORD NUMBER <i>210605</i>
			6. REFERENCE NUMBER <i>0</i>
			7. DATE RECEIVED (EPA) <i>12/15/87</i>
			8. STATUTORY DUE DATE
			9. PRODUCT MANAGER (PM) <i>11/22/87</i>
			10. PM TEAM NUMBER <i>21</i>

14. CHECK IF APPLICABLE

- ☐ Public Health/Quarantine  
  
☐ Substitute Chemical  
  
☐ Seasonal Concern

☐ Minor Use  
  
☐ Part of IPM  
  
☐ Review Requires Less Than 4 Hours

*AH*

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS <i>12-23-87</i>
12. PRIORITY NUMBER <i>50</i>
13. PROJECTED RETURN DATE <i>3-7-88</i>

15. INSTRUCTIONS TO REVIEWER

- A. HED

☐ Total Assessment - 3(c)(5)  
☐ Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.  
  

B. SPRD (Send Copy of Form to SPRD PM)

☐ Chemical Undergoing Active RPAR Review  
☐ Chemical Undergoing Active Registration Standards Review

C.

☐ BFS  
☐ TSS/RD  
☐ Other

F. INSTRUCTIONS

16. RELATED ACTIONS

*3125-320*

17. 3(c)(1)(D)

- ☐ Use Any or All Available Information  
☐ Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.

☐ Use Only Attached Data

18. REVIEWS SENT TO

- ☐ TB  
☒ RCB

☐ EEB  
☒ EFB

☐ EF  
☐ CH

☐ PL  
☐ BFS

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	<input checked="" type="checkbox"/> ENVIRONMENTAL DATA								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFS	ECONOMIC ANALYSIS								

20. ☐ Label Submitted with Application Attached

21. ☐ Confidential Statement of Formula

22. ☐ Representative Labels Showing Accepted Uses Attached

23. Date Returned to RD (to be completed by HED)

24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.

# REGISTRATION DIVISION DATA REVIEW RECORD

Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

415)  
12-23-87

CHEMICAL NAME

BIBI A BAYLETON

44105

2. IDENTIFYING NUMBER 3125-320	3. ACTION CODE 335	4. ACCESSION NUMBER —	TO BE COMPLETED BY PM
			5. RECORD NUMBER 210609
			6. REFERENCE NUMBER 21
			7. DATE RECEIVED (EPA) 121.5/87
			8. STATUTORY DYE DATE
			9. PRODUCT MANAGER (PM) K. J. J.
			10. PM TEAM NUMBER 21

## 14. CHECK IF APPLICABLE

- ☐ Public Health/Quarantine ☐ Minor Use
- ☐ Substitute Chemical ☐ Part of IPM
- ☐ Seasonal Concern ☐ Review Requires Less Than 4 Hours

## TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS  
12-23-87
12. PRIORITY NUMBER  
50
13. PROJECTED RETURN DATE  
2-7-88

## 15. INSTRUCTIONS TO REVIEWER

- A. HED ☐ Total Assessment - 3(c)(5) ☐ Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
- B. SPRD (Send Copy of Form to SPRD PM)
- ☐ Chemical Undergoing Active RPAR Review
- ☐ Chemical Undergoing Active Registration Standards Review
- C. ☐ BFSD ☐ TSS/RD ☐ Other

## F. INSTRUCTIONS

## 16. RELATED ACTIONS

3125-340

## 17. 3(c)(1)(D)

- ☐ Use Any or All Available Information ☐ Use Only Attached Data
- ☐ Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.

## 18. REVIEWS SENT TO

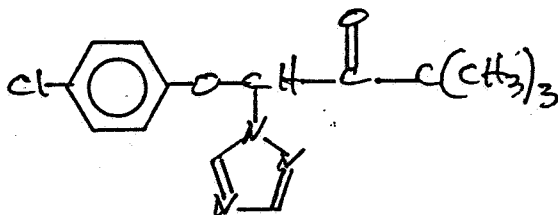
- ☐ TB ☐ EEB ☐ EF ☐ PL
- ☒ BCB ☒ EFB ☐ CH ☐ BFSD

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	ENVIRONMENTAL DATA	1							
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFSD	ECONOMIC ANALYSIS								

20. ☐ Label Submitted with Application Attached
21. ☐ Confidential Statement of Formula
22. ☐ Representative Labels Showing Accepted Uses Attached
23. Date Returned to RD (to be completed by HED)
24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.

1.

1. CHEMICAL:                      Common Name- Triadimefon (Bayleton)  
   Chemical Name- 1-(4-chlorophenoxy-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone  
   Trade Name- BAYLETON 50% WP and WP in Water Soluble parkets.  
   Chemical Structure-



2. TEST MATERIAL: Not applicable.  
3. STUDY/ACTION TYPE: Mobay Chemical Corp is responding to a previous review (7/30/87).  
4. STUDY IDENTIFICATION: Not applicable. No new data submitted.  
5. REVIEWED BY:

Herbert L. Manning, Ph.D.  
Microbiologist  
EAB/HED

Signature: *Herbert L. Manning*  
Date:

MAY 31 1988

6. APPROVED BY:

Paul Mastradone, Ph.D.  
Acting Chief, Section 1, EAB/HED

Signature: *Paul Mastradone*  
Date:

MAY 31 1988

7. CONCLUSION:

EAB stated in the review of 7/30/87 that the data Mobay provided to satisfy rotational crop requirements for pea pods and vines and leafy vegetables (lettuce or spinach) were on primary crops and not rotational crops, as required. However, in their letter of 12/7/87 (attached), Mobay correctly stated that the data was on rotational crops. Mobay also applied for tolerances on residues in the pea pods and vines and leafy vegetables of rotated crops (field study).

Residues (>0.01 ppm, the limit of detection) were found in peas (0.02 ppm, 71 day interval), in pea pods (0.04 ppm, 71 day interval), and in the green vines of peas (0.59 ppm in NY, 71 day interval; 0.02 ppm in MN, ID, and WA, with plant-back intervals of 77, 73, and 73 days, respectively). No residues

4

were detected in lettuce at a plant-back interval of 88 days.

In their review, RCB recommended against the proposed tolerances. Mobay responded to RCB's comments in the attached letter of 12/7/87.

8. RECOMMENDATION:

EAB defers to RCB as to the disposition of the proposed tolerances on rotated pea pods and vines. If the residue tolerances are established, the studies would not have to be repeated (for the crops with residues) to determine the no-residue, plant-back interval. If the residue tolerances are not granted, Mobay will have to either propose new residue tolerances or repeat the studies to determine the non-residue interval (must be 12 months or less).

The rotational crop data for lettuce (attached Table #21) supports a 90-day plant-back (treatment-to-planting) interval.

9. BACKGROUND:

A. Introduction- See the attached information.

B. Direction for Use- Not applicable.

10. DISCUSSION OF INDIVIDUAL STUDIES:

Not applicable.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CBI APPENDIX:

Contains supporting information.

CBI APPENDIX

Triadimefon environmental fate review

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Page \_\_\_\_\_ is not included in this copy.

Pages 7 through 14 are not included in this copy.

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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 product 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.

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