



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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MAY 31 1989

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MEMORANDUM

**SUBJECT:** 89-DA-08; Section 18 Exemption for the use of  
Triadimefon (Bayleton® 50% WP) on Coffee.  
Addendum to DEB review dated 4/5/89;  
(No MRID #, No DEB #).

**From:** Freshteh Toghrol Ph.D., Chemist  
Special Registration Section II  
Dietary Exposure Branch  
Health Effect Division (H7509C)

**THRU:** Francis B. Suhre, Acting Section Head  
Special Registration Section II  
Dietary Exposure Branch  
Health Effect Division (H7509C)

**To:** D. Stubbs/L. Pemberton, PM 41  
Emergency Response Section  
Registration Support Branch  
Registration Division (H7505C)

and  
Toxicology Branch  
Health Effect Division (H7509C)

The Registration Division has requested (personal communications L. Pemberton, 5/23/89) that DEB estimate residues on instant coffee and roasted coffee beans treated in accordance with 89-PR-03.

In our review of 89-PR-03 (F. Toghrol memo dated 4/5/89), we did not estimate triadimefon residues in the processed fraction of coffee (roasted beans and instant coffee).

No residue data were provided for roasted or instant coffee with this Section 18 request, nor with the minor crop petition previously submitted in support of the permanent tolerance for triadimefon in or on coffee beans at 0.1 ppm (PP#3E2938/FAP4H54433, R. Cook memo dated 1/27/84). In connection with

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DEB's review of PP#3E2938/FAP#4H5433, we concluded: "  
 ....Assuming that the proposed tolerance is adequate (0.05 ppm) and 1) 5 grams of coffee beans per 250 ml. of beverage, 2) all residues present survive the roasting process, and 3) all residues transfer to the brewed beverage, then at most 5 g. X 0.05 microgram/g = 0.25 microgram per 250 ml. or 0.001 ppm in brewed beverage. In recognition of the facts that instant coffee powder is reconstituted to the beverage and losses of residue during roasting, extraction and drying make concentration of residue in instant coffee powder unlikely, data for instant coffee powder are not required. Residues in brewed coffee will be much less than in the raw commodity."

#### Conclusions:

Based on above discussion for bayleton treated coffee, (coffee beans, roasted or instant), we conclude that residues of triadimefon/ metabolites in and on coffee beans, instant coffee or roasted coffee (treated in accordance with 89-PR-03) will not exceed 0.1 ppm.

#### Recommendations:

TOX considerations permitting, DEB has no objections to this section 18 crisis exemption (89-PR-03). An agreement should be made with the FDA regarding the legal status of the treated commodities in commerce.

cc: Bayleton S.F., R.F., Section 18 S.F., Circ., F. Toghrol, R. Schmitt Acting Chief, TAS (R. Tomerlin), PMSD/ISB.  
 RDI: F. B. Suhre Acting Section Head (5/26/89): E. Zager: Acting Deputy Chief (5/26/89):  
 TS-H7509C:DEB:F.Toghrol:F.T.:RM:802:CM#2:5/26/89