8-5-82

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

AUG 5 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-LA-13. Proposed Section 18 exemption for the use of Bayleton (Triadimefon) on sugarcane in Louisiana

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Edward Zager

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

CT

TO: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The State of Louisiana requests a Section 18 exemption for the use of Bayleton to control sugarcane smut on sugarcane seed pieces.

Temporary tolerances for residues of Bayleton and its metabolite KWG 0519 have been established at 0.01 ppm in milk, eggs and the meat, fat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep. These will expire on 12/31/82.

The proposed use would permit dipping the seed cane in water containing 250 ppm Bayleton for 30 minutes before planting. Treated seed pieces will be used for planting only. There is at least a 12 month PHI built into this use.

The metabolism of Bayleton in apples and animals was discussed in the reviews of PP#0G2300 (memo of J. Worthington, 4/10/80) and FAP#1H5282 (memo of J. Worthington, 3/2/81). For the purpose of this Section 18 use we consider the residue of concern in plants and animal tissues to be Bayleton and its metabolite KWG 0519.

No residue data reflecting the proposed use are available. However, no detectable residues were found in sugarcane at 5 months following 3 foliar applications of 0.5 lb act/A.

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Because of the long PHI only trace residues are likely in sugarcane. Consequently, we would notexpect a significant concentration of residues in sugar, bagasse and molasses.

We thus estimate that residues of Bayleton and its metabolite KWG0519 will not exceed 0.1 ppm in or on sugarcane, sugar, bagasse and molasses as a result of the proposed use.

Meat, Milk, Poultry and Eggs

Feeding studies were discussed in our review of FAP#1H5282 and at that time we concluded that the apple and grape uses would fall under Category 2 of 180.6(a). Thus in conjunction with those uses which would result in a dietary burden of approximately 2 ppm we recommended for the establishment of a temporary 0.01 ppm tolerance for residues of Bayleton and its metabolite KWG0519 in milk, eggs and the meat, fat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep. The use proposed here will not contribute significantly to the existing dietary burden. Therefore, it is our judgement that the above meat, milk, poultry and egg tolerances will be adequate to cover any secondary residues resulting from the proposed use.

Conclusions

1. Residue of Bayleton and its metabolite KWG0519 will not exceed 0.1 ppm in or on sugarcane, sugar, bagasse and molasses as a result of the proposed use.

2. Secondary residues of Bayleton and KWG0519 in milk, eggs and the meat, fat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep will not exceed the established 0.01 ppm temporary tolerance.

Recommendation

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

cc: Bayleton S.F.
Section 18 S.F.
R.F.
Circu
Reviewer
TOX

RDI:Section Head:RJH:Date:8/2/82:RDS:Date:8/2/82
TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM#2:RM:810:Date:8/4/82