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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Proposed Section 18 exemption for the use of triadimefon (Bayleton) on wheat.

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THRU: Charles L. Trichilo, Chief
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CT

The State of Oregon requests a Section 18 exemption to allow the emergency use of Bayleton [1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone] on wheat to control various rusts.

A Section 18 exemption was granted for the use of Bayleton on grapes in the state of New York; however, Residue Chemistry Branch did not review the proposal. Temporary tolerances of 1 ppm for residues of Bayleton on apples and grapes was granted pursuant to PP#OG2300. FAP#1H5282 proposing temporary food additive tolerances for Bayleton on apple and grape byproducts and PP#1G2432 proposing temporary tolerances for Bayleton on wheat and barley are currently pending.

The current request entails the use of 50,000 lbs. active ingredient for the treatment of 400,000 acres of wheat to control various rusts. The proposed use involves one or two applications to wheat at rates of 2 to 4 ounces active ingredient (as Bayleton 50% Wettable Powder) per acre. Minimum spray volumes of 20 gallons per acre for ground applications and 5 gallons for aerial applications are required. A 60 day preharvest interval is also required. A restriction against the use of treated wheat for forage, feed or fodder has been imposed.

PP#1G2432 proposing a 0.1 ppm temporary tolerance for residues of Bayleton on wheat and barley, resulting from essentially the same use pattern was recently reviewed (see memo of 2/27/81 by John Worthington.) The following requirements remain outstanding for a favorable recommendation on PP#1G2432:

- 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.

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The wording of the feeding restriction proposed here precludes the use of straw as a feed item. Thus, requirement #1 does not apply. Requirement #2 is not relevant to the requested exemption.

Conclusions and Recommendations

1. The fate of Bayleton in wheat is adequately delineated for the purpose of the requested exemption. The residues of concern are Bayleton, per se, and its metabolite, KWG 0519, [β -(4-chlorophenoxy)- α -(1,1-dimethylethyl)-1H-1,2,4-triazol-1-ethanol].

2. Adequate methodology is available to determine residues of Bayleton, per se, and its metabolite KWG 0519 in wheat.

3a. The available residue data adequately demonstrate that residues of Bayleton, per se, and its metabolite, KWG 0519, resulting from the requested exemption will not exceed 0.1 ppm in wheat grain.

3b. A restriction against the use of treated wheat for forage, feed or fodder has been imposed.

3c. We are not requiring milling fraction data for the requested exemption.

4. Secondary residues of Bayleton in meat, milk, poultry and eggs are not expected to exceed 0.01 ppm.

TOX considerations permitting, (see Conclusions 3a and 4) and contingent upon the establishment of an agreement with FDA regarding the legal status of treated wheat and wheat products in commerce, we recommend that the requested exemption be granted.