

323EE

Date Out EFB:  
DEC 16 1982

To: Jacoby  
Product Manager 21  
Registration Division (TS-767)

From: Emil Regelman, (Acting) Chief  
Review Section No. 1  
Environmental Fate Branch  
Hazard Evaluation Division (TS-769)

COPY

Attached please find the environmental fate review of:

Reg./File No: 100-AUR

Chemical: CGA-64250

Type Product: Fungicide

Product Name: BANNER

Company Name: Ciba-Geigy

Submission Purpose: new product on turf

ZBB Code: other

ACTION CODE: 175

Date in: 10/6/82

EFB # 4

Date completed: 12/16/82

Tais (level II) Days

63

2.0

Deferrals To:

Ecological Effects Branch

Residue Chemistry Branch

Toxicology Branch

## 1.0 INTRODUCTION

Ciba-Geigy Corporation has submitted a label for the registration of a new use pattern of CGA-64250 (1-(2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl)methyl)-1H-1,2,4-triazole) on turf. No new EC data has been submitted. CGA-64250, formulated as Tilt®, is registered for a terrestrial non-food use on grass grown for seed.

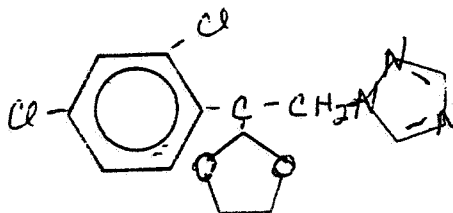
## 2.0 CHEMICAL IDENTITY

Chemical name: 1-(2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl)methyl)-1H-1,2,4-triazole

Product name: Banner

Company code number: CGA-64250

Structure:



## 3.0 DIRECTIONS FOR USE

See attached proposed label.

## 4.0 DISCUSSION

This use of 4 oz./1000 ft.<sup>2</sup> of a 1.1 lb ai/gal formulation results in an application rate of 1.5 lb ai/A. The previous registration was for the use of 0.5 pt/A of a 3.6 lb ai/gal formulation which resulted in an application rate of 0.225 lb ai/A. This is a significant difference in application rates for a similar use. No explanation is offered for this difference.

We also note that no field dissipation study has been submitted for CGA-64250. In lieu of this study, the soil dissipation half-life of 10 weeks was taken as reflecting the field dissipation. This indicates that CGA-64250 is a persistent chemical which may build up on repeated application and repeated applications are allowed for this use. EFB deferred to EEB on 6/17/81 relative to the potential significance of this persistence.

## 5.0 CONCLUSIONS

1. Hydrolysis, soil and water photolysis, adsorption/desorption, leaching, aerobic and anaerobic soil metabolism, and fish accumulation data requirements have been satisfied for CGA-64250.
2. No rotational crop data have been provided. It is assumed that turf use will not involve rotation to food or feed crops.
3. This use involves a significantly higher application rate than the previous registration (1.5 lb ai/A vs. 0.225 lb ai/A).
4. The field dissipation study data requirement has still not been satisfied.

## 6.0 RECOMMENDATIONS

1. EFB cannot concur with the proposed label amendment.
2. The registrant should submit the requisite field dissipation study at the higher proposed application rate.

*Norma Kay Whetzel*

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December 16, 1982  
Review Section No. 1  
Environmental Fate Branch  
Hazard Evaluation Division

TILT CGA-64250 Reviews

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The next 6 page(s) is/are not included in this copy of the TILT reviews.

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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
  - ☐ Detailed methods and results of a registrant submission.
  - ☐ Duplicate pages.
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The information not included generally is considered confidential by product registrants. If you wish to obtain the information deleted, please contact the individual who prepared this response to your request.

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