To: Rebecca Cool  
Product Manager 41  
Registration Division (H7505C)

From: Douglas J. Urban, Acting Chief  
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg.-/File #: 92 TX 0016  
Chemical Name: metadoxyl plus mancozeb  
Type Product: Fungicide  
Product Name: Pace  
Company Name: Texas Dept. of Agriculture  
Purpose: Proposed Sec. 18 for use on roses

Action Code: 515  
Date Due: 05-11-92  
Reviewer: H. Mannfield

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**EEB Guideline/MRID Summary Table:** The review in this package contains an evaluation of the following:

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Y=Acceptable (Study satisfied Guideline)/Concur  
P=Partial (Study partially fulfilled Guideline but additional information is needed)  
S=Supplemental (Study provided useful information but Guideline was not satisfied)  
N=Unacceptable (Study was rejected)/Nonconcur
MEMORANDUM

SUBJECT: Section 18—Pace Fungicide (Metalaxyl plus Mancozeb)
DP Barcode: 177212
ID No: 113501

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

TO: Rebecca Cool, PM 41
Emergency Response and Minor Use Section
Registration Division (H7505C)

The Texas Department of Agriculture was granted an emergency exemption 4/2/92 for the use of Pace fungicide on roses to control downy mildew. Pace is comprised of two actives: 7% metalaxyl and 70% mancozeb. The product is used at a rate of 1.5 to 2.0 lbs of formulated product per 100 gallons of water every 10-14 days, with a maximum of 6 applications per season.

Both of the chemicals that comprise Pace are registered for use on roses to combat other diseases. Dithane DF, with 75% mancozeb, is used on roses for Black spot, Cercospora leaf spot, and petal blight at a rate of 1.5 lbs formulated product per 100 gallons of water 2-3 times a week. The amount of active used in Pace is similar to that of Dithane. The label for Subdue 2E, a metalaxyl formulation, is apparently unavailable.

If it is assumed that the use rate of metalaxyl on roses in Subdue 2E is the same as in Pace, since EEB does not attempt to consider possible synergistic effects resulting from multiple active ingredients when performing a risk assessment, it may only be said that the risk to the environment from this use of Pace on roses is not expected to be greater than the risk from its current registered uses on roses. If it becomes apparent that the use metalaxyl in Pace is higher than its other registered uses on roses, further evaluation will be necessary.

If there are any questions, please call Heather Mansfield (305-5064).
MEMORANDUM

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CONCURRENCES

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DATE 5/13/92 5/22/92 5/24/92

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