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

DEC 5 1989

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: Metalaxyl  
EPA Reg. No. 100-607 (Ridomil 2E Fungicide)  
EPA Reg. No. 100-628 (Ridomil 5G Fungicide)  
No MRID No.; DEB No. 5994 and 5995.

From: Francis B. Suhre, Chemist *Francis B. Suhre*  
Special Registration Section II  
Dietary Exposure Branch  
Health Effects Division (H7509C)

Thru: Leung Cheng, Ph.D., Acting Section Head *L. Cheng*  
Special Registration Section II  
Dietary Exposure Branch  
Health Effects Division (H7509C)

To: Susan Lewis, PM-21  
Herbicide and Fungicide Branch  
Registration Division (H7505C)

RD has requested that DEB review and comment on a rotational crop residue study protocol entitled, "Ridomil Double Cropping Program."

Background

This protocol was submitted by CIBA-GEIGY Corp. in response to concerns expressed by DEB and EAB in connection with PP#3F2918/FAP#3F2955 (legumes), as follows:

"We defer to EAB as to whether yearly applications of metalaxyl to soil at the maximum rate (3 lbs. ai/A) would result in a build up of soil residues and, if so, to what extent. Our concern is that residues remaining in the soil from earlier uses could add a significant amount of residue to that expected from the proposed use" (PP#3F2918, K. Arne, memo 12-13-83)

EAB responded by stating that data were not available to address this deferral, and that EAB would assist DEB in obtaining the required data (S. Greger, memo 11-25-85).

On Nov. 25, 1985, PM-21 (H. Jacoby) informed CIBA-GEIGY Corp. that crop rotational data were required to support the continued registration of Ridomil 2E (EPA Reg. No. 100-607) and recommended that the petitioner consult OPP with respect to the experimental design prior to initiation of the study.

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Protocol

Residue trials will be conducted in TX (1), FL (2), and CA (2).  
 Ridomil 2E or 5G will be applied at maximum registered rates.  
 The proposed crop rotational schedule is:

<u>Site</u>	<u>Crop</u>	<u>Duration</u>	
TX	Cucurbits	Sep. - Oct.	
	Cole Crops	Nov. - Jan.	
	Cucurbits	Feb. - Mar.	
	Cotton	Apr. - Aug.	
FL	Tomatoes	Oct. - Mar.	Mineral soil/ plastic mulch
	Cucurbits	APR. - Jun.	
FL	Lettuce	Oct. - Jan.	Muck soil/ no mulch
	Broccoli	Jan. - Apr.	
CA (Southern)	Tomatoes	Feb. - Jun.	
	Tomatoes	Jul. - Oct.	
	Lettuce	Nov. - Dec.	
CA (Salinas Valley)	Cole Crop	Nov. - May	
	Onions	Jun. - Sep.	

DEB's conclusion/recommendation

The study protocol provided by CIBA-GEIGY Corp. is too brief and general in scope for DEB to draw any conclusions concerning its adequacy. We recommend that the registrant submit a more detailed protocol, addressing: field trial treatments and procedures; sampling (harvesting), handling, shipping, and storage of the R.A.C.; storage stability validation of the test chemical; residue analyses of field samples for the "total toxic residue"; validation (recovery studies) of the residue analytical method; reporting of the data; and quality control measures/precautions taken to ensure the fidelity of these operations.

cc:R.F., Metalaxyl S.F., Circu, Reviewer, Schmitt, PMSD/ISB  
 LC:12/4/89:EZ:12/4/89  
 H7509C:DEB:FBS:fbs:557-1883:CM#2:RM814:12/5/89