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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCESMEMORANDUM

SUBJECT: ID #000100-00607 and #000100-00628: Amended Registration of Metalaxyl in/on Ginseng (MRID #416889-00, #416889-01, CBTS #9054 and #9058).

FROM: W. T. Chin, Ph.D., Chemist *W. T. Chin*
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THRU: P. V. Errico, Section Head *P. V. Errico*
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Chemistry Branch, Tolerance Support
Health Effects Division (H7509C)

TO: Susan Lewis, PM #21
Registration Division (H7505C)

BACKGROUND

In connection with PP#1E3926, the Agency proposed establishing a tolerance for the combined residues of metalaxyl, [N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester] and its metabolites, in or on ginseng at 3.0 ppm (FR p.42577, 8/28/91). This proposed rule was subject to 30 days of public comment, which expired on 9/27/91.

The petitioner, IR-4, and Ciba-Geigy submitted an amended registration on 9/13/91 with Supplemental Labelings of Ridomil® 5G and Ridomil® 2E, the two formulations of metalaxyl, to clarify the Direction For Use of these products on ginseng.

Metalaxyl is a List A chemical. The Metalaxyl Registration Standard was issued in September, 1988; the Chemistry Chapter was issued on 6/22/87 and updated on 3/13/91.

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DETAILED CONSIDERATIONS

Ciba-Geigy markets two formulations of metalaxyl: Ridomil® 5G (EPA Reg. #100-607, 5% ai and 95% inert) and Ridomil® 2E (EPA Reg. #100-628, 25.1% ai and 74.9% inert, 2 lb ai/gal). These two products were used for field trials in 1988-1989 on ginseng and the residue data generated were reported in MRID #614889-01 by which a 3.0 ppm tolerance for the combined residues of metalaxyl and its metabolites in/on ginseng has been proposed by the Agency (FR p.42577, 8/28/91).

However, the proposed rate shown under Direction For Use on page 6 of MRID #614889-00 was given in terms of lb ai (metalaxyl)/A/season without specifying the use of these two products, as cited below:

Direction For Use of Metalaxyl (p. 6, MRID #416889-00, 10/31/90)

"Metalaxyl applied to the soil before early spring growth followed by additional applications at monthly intervals will control phytophthora root rot in ginseng caused by phytophthora cactorum.

Apply metalaxyl at 0.75 lb ai/A uniformly to the soil surface in the spring before the plants begin growing. Make additional applications of metalaxyl at monthly intervals at 0.5 lb ai/A. Up to four supplemental applications may be made. The last application of metalaxyl may be made at 0.75 lb ai/A.

Notes: To avoid possible illegal residues, (1) Do not apply more than a total of 3 lbs ai of metalaxyl/A of ginseng/growing season and (2) Do not harvest ginseng within 9 days of a metalaxyl application."

Based on the proposed rate of metalaxyl shown above, the Direction For Use of these two products were clarified during the 1988-1989 field trials, as cited below:

Direction For Use of Ridomil® 5G and Ridomil® 2E (p. 8, MRID #416889-01, 9/12/90):

".... for a maximum of five applications of metalaxyl: The first treatment can be made using either Ridomil® 2E or Ridomil® 5G at 0.75 lb ai/A as a soil application prior to

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early spring growth, followed by four additional supplemental applications using only Ridomil® 5G formulation at 0.50 lb ai/A at monthly intervals. The last application may be made at 0.75 lb ai/A. The directions do not allow the use of Ridomil® 2E formulation in any of the supplemental applications in order to minimize the possibility of resistance....."

In order to be consistent and to avoid possible misunderstandings, the petitioner currently submits an amended registration with revised Supplemental Labelings of Ridomil® 5G and Ridomil® 2E as follows:

The Revised Direction For Use of Ridomil® 5G (9/13/91)

"Ridomil® 5G applied to the soil before early spring growth followed by additional applications at monthly intervals will control phytophthora root rot in ginseng caused by phytophthora cactorum.

Apply Ridomil® 5G at 15 lbs/A uniformly to the soil surface in the spring before the plants begin growing. Make additional applications of Ridomil® 5G at monthly intervals at 10 lbs/A. Up to four supplemental applications may be made. The last application of Ridomil® 5G may be made at 15 lbs/A.

Notes: To avoid possible illegal residues, (1) Do not apply more than a total of 60 lbs of Ridomil® 5G/A of ginseng/growing season. (2) If Ridomil® 2E is applied to the soil before early spring growth, do not apply more than 45 lbs of Ridomil® 5G as supplemental applications. (3) Do not harvest ginseng within 9 days of a Ridomil® 5G application."

The Revised Direction For Use of Ridomil® 2E (9/13/91)

"Ridomil® 2E applied to the soil before early spring growth followed by additional applications of Ridomil® 5G (see Ridomil® 5G label) will control phytophthora root rot in ginseng caused by phytophthora cactorum.

Apply Ridomil® 2E at 3 pts/A as a drench in 100-400 gallons of water uniformly to the soil surface in the spring before the plants begin growing.

Note: Do not make any additional applications of Ridomil® 2E."

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Comment/Conclusion

The last Note of the revised Direction For Use of Ridomil® 5G should be corrected to: (3) Do not harvest ginseng within 9 days after a Ridomil® 5G application.

The original Direction For Use previously submitted on p. 6 of MRID #416889-00 dated 10/31/90 is not changed, but is clarified by the supplemental labelings of Ridomil® 5G and Ridomil® 2E. Since field trials are reflective of the supplemental labelings of Ridomil® 5G and Ridomil® 2E and the residue data so generated are adequate to support the 3.0 ppm tolerance for the combined residues of metaxyl and its metabolites in/on ginseng as proposed by the Agency, CBTS has no objections to this amended registration.

Recommendation

Pending correction of the Note (3) of the revised Direction For Use of Ridomil® 5G, CBTS has no objections to this amended registration.

cc: Circu, RF, PP#1E3926, W.T.Chin, Amended Reg. file.

RDI: P.V.Errico (3/4/92), R.Loranger(3/4/92)
H7509C: CBTS: CM#2, RM812, 305-5352, W.T.Chin,wc(3/5/92)