



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

MAY 16 1995

MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: PP#2F04072. Metalaxyl (113501) in/on the
Brassica Leafy Vegetables Group (#5).
Letter of 5/2/94 Amending Petition.
DP 208058 CBTS 14524 MRID 432185-01

FROM: Maxie Jo Nelson, Ph.D., Chemist
CBTS/HED (7509C) *mjn*

THRU: Robert S. Quick, Section Head
CBTS/HED (7509C) *Robert S. Quick*

TO: (1) C. Welsh/K. Scanlon, PM Team 21
FHB/RD (7505C)
(2) Jane Smith, Acting Section Head
RCAB/HED (7509C)

By letter dated 5/2/94, the petitioner (Ciba-Geigy Corporation) has responded to the deficiencies raised in the CBTS review of 1/15/93 (M. Peters). Those deficiencies are paraphrased below, followed by Ciba's response, and our comments/conclusions.

7. CBTS requires enough data to determine how corrected metalaxyl residue values were obtained. Uncorrected residue data (ppm of metalaxyl equivalents) or chromatogram data (peak heights, peak areas, etc.) should be submitted for mustard greens.

Ciba-Geigy: The information requested and an example of data calculations are provided in accompanying Report ABR-93078 (assigned MRID# 432185-01).

CBTS: This deficiency is resolved.

8. Maximum residues of metalaxyl on mustard greens were 4.7 ppm after correcting for the loss in storage. A tolerance of 5.0 ppm on mustard greens appears to be adequate provided that CBTS accepts the petitioner's method of correction for the existing residue data.



Ciba-Geigy: The raw data sheets and a discussion of data calculations are contained in accompanying Report ABR-93078 (MRID# 432185-01).

CBTS: This deficiency is resolved.

9. Maximum residues of metalaxyl vary between the representative crops mustard greens (4.7 ppm) and cabbage (0.53 ppm) by more than a factor of five. Therefore, a crop group tolerance for metalaxyl in/on *Brassica* (cole) leafy vegetables is inappropriate (per 40 CFR 180.34(f)(5)).

Ciba-Geigy: Noted; Section F has been revised to propose the tolerances suggested by the Agency.

CBTS: This deficiency is resolved. (See Recommendations for proposed tolerances.)

10. Maximum residues of metalaxyl from the soil plus foliar applications were 0.53 ppm for cabbage, 0.87 ppm for cauliflower, and 1.3 ppm for broccoli after correcting for loss in storage. Thus, tolerances of 1.0 ppm for cabbage and cauliflower and 2.0 ppm for broccoli would be appropriate to cover the soil plus foliar uses.

Ciba-Geigy: Section F has been revised accordingly.

CBTS: This deficiency is resolved.

11. The current tolerance of 0.1 ppm on Brussels sprouts as a member of the *Brassica* crop group reflects a seed treatment. The petitioner has proposed a tolerance to reflect a foliar application on *Brassica* (cole) leafy vegetables. Since CBTS cannot recommend in favor of a tolerance for the crop group, the petitioner must propose a tolerance on Brussels sprouts, independent of the current crop group tolerance, if they wish to register the foliar application for use on Brussels sprouts. Translation of the broccoli residue data to Brussels sprouts would indicate that a 2 ppm tolerance for metalaxyl on Brussels sprouts is appropriate.

Ciba-Geigy: The revised Section F proposes a 2 ppm tolerance for Brussels sprouts.

CBTS: This deficiency is resolved.

RECOMMENDATIONS

All outstanding deficiencies raised by CBTS in re this petition now having been resolved, and toxicological considerations permitting, CBTS recommends as follows for 40 CFR 180.408(a):

- (1) Amend the established *Brassica* (cole) leafy vegetables group commodity tolerance to read:

Brassica (cole) leafy vegetables group [except broccoli, cabbage, cauliflower, **Brussels sprouts**, and **mustard greens**]..... 0.1 ppm.

- (2) Decrease the established tolerance for Cabbage and Cauliflower (from 2 ppm) to **1 ppm** (for each).
- (3) Add tolerances for **Brussels sprouts** at **2 ppm** and **Mustard, greens** at **5 ppm**.
- (4) Retain the established tolerance level on Broccoli at 2 ppm.

cc: M. Nelson, RF, Circ, PP#2F4072, B. Doyle (DRES/SAB).

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