



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

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SEP 30 1993

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP#1F3993. EPA Reg. No. 100-601. September 30, 1992
Letter to OPP from Ciba-Geigy re: proposed METALAXYL
tolerances. CBRS #: 10833. DP Barcode #: D183914.
MRJD #: None.

FROM: David Miller, SA, HSO, USPHS *Wherry for*
Special Review Section I
Reregistration Support Section II
Health Effects Division (H7509C)

THRU: Edward Zager, Chief *Zager*
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TO: B. Chambliss, PM Team 21
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The instruction on the PRATS sheet is to review the revised section F on cereal grains for this petition.

The Ciba-Geigy Corporation Agricultural Division (Ciba-Geigy) submitted a revised section F (September 30, 1992; pin punched 10-7-92) to replace the current 0.1 ppm tolerance for grain, crops. The registrant requested to amend 40 CFR 180.408(a) to include combined residues of the fungicide metalaxyl [N-(2,6-dimethylphenyl)-N-methoxyacetyl) alanine methyl ester] and its metabolites containing the 2,6-dimethylaniline moiety, and N-(2-hydroxymethyl-6-methyl)-N-(methoxyacetyl)-alanine methyl ester, each expressed as metalaxyl in/on the following raw agricultural commodities:

- Cereal Grains (except wheat, barley, and oats) - 0.1 ppm (replacing Grain Crops @ 0.1 ppm)
- Forage, fodder and straw of Cereal Grains Group (except wheat, barley and oats) - 1.0 ppm

In their 9/30/92 letter, the petitioner states that the Agency's recent review of data supporting these proposed tolerances (June 19, 1992 memorandum) "seems to indicate that the Agency should be in a position to move forward with the establishment of these tolerances." The Agency's June 1992 memorandum (CBTS No. 9011, J. Morales) does not support the establishment of either of these two tolerances, and instead requires additional information and data be submitted regarding the estimated exaggerated use rate on rice and sample chromatograms so that a determination of the potential for concentration in rice bran can be made.

Subsequently, the registrant provided chromatograms for rice and rice bran and calculations supporting the exaggerated treatment rates applied. CBRS (J. Abbotts, 7/22/93, #11238) concluded that requested information and data were adequate and a food additive tolerance in/on rice bran was not required.

RECOMMENDATIONS:

We recommend the proposed tolerances of 0.1 ppm in/on cereal grains group (except wheat, barley, and oats) and 1 ppm in/on forage, fodder, and straw of cereal grains group (except wheat, barley, and oats) be established.

cc: RF, SF, Reg Std F, PP No. 1F3993, Circ., DJM.
RDI: RPerfetti:9/24/93; MMetzger:9/29/93; EZager:9/29/93