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

MAY 12 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

Memorandum

Subject: PP#0F3893. Metalaxyl (**Ridomil 2E, 5G**) in/on Leafy Vegetables (Excluding Brassica, Excluding Spinach). Amendment of 3/17/92. CBTS# 9710. No MRID#. DP Barcode# D176810.

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To: Ben Chambliss/Susan Lewis (PM21)
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CIBA-GEIGY has submitted its response, including a revised Section B and a Confidential Statement of Formula for **Ridomil 70W**, to the deficiency (Conclusion 5a) outlined in our previous memo (R. Lascola, 12/18/91) concerning the proposed establishment of a tolerance for the combined residues of metalaxyl [N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester], and its metabolites containing the 2,6-dimethylaniline moiety, and N-(2-hydroxymethyl-6-methylphenyl)-N-(methoxyacetyl)-alanine methyl ester, each expressed as metalaxyl, in/on leafy vegetables (excluding Brassica and spinach) at 5 ppm.

The previously submitted Section B proposed a preplant soil application of 1-2 lbs ai/A of either **Ridomil 2E** or **5G**, followed by (if necessary) foliar application of **Ridomil MZ58**, a metalaxyl/mancozeb wettable powder mixture. Use of MZ58 was proposed in accordance with residue trials, submitted in support of the petition, which involved use of that formulation. However, CBTS did not approve the label, since there are no tolerances for mancozeb on non-Brassica leafy vegetables. In a communication with the petitioner (R. Lascola memo of 3/13/92), the Agency stated that it might be possible to translate data generated with **MZ58** to another wettable powder formulation with the same concentration of metalaxyl and similar inert ingredients. If these requirements were met, CBTS would anticipate that residues of metalaxyl

in crops treated with the new formulation would be the same as those found in **MZ58**-treated commodities.

The petitioner has submitted a revised Section B, which specifies the use of **Ridomil 70W**, a wettable powder metalaxyl/copper hydroxide mixture. The proposed preplant soil treatment with **Ridomil 2E** or **5G** remains unchanged. **70W** is to be applied foliarly at a rate of 1.05-1.4 lbs total ai/A (corresponding to 0.15-0.2 lb ai/A metalaxyl). This rate is identical to the rate proposed previously for the **MZ58** formulation. The inert ingredients for the **MZ58** and **70W** formulations are identical; therefore, similar metalaxyl residues are expected in the target commodities for application at the same rate of active ingredient. Also, copper is exempt from tolerances under 40 CFR §180.1021, and therefore no use is being proposed on the current label for any active ingredient lacking a tolerance for the leafy vegetables (except Brassica, except spinach) crop group.

The petitioner has therefore satisfied the remaining deficiency for this petition. **CBTS recommends in favor of the proposed crop group tolerance of 5 ppm for metalaxyl on leafy vegetables (except Brassica, except spinach).**

cc: R. Lascola, SF, RF, D. Edwards, PP#0F3893, Circulation (7), C. Furlow (PIB/FOD)
H7509C:CBTS:RLascola/rjl:CM#2:Rm803C:305-7478:5/6/92

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