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HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP's # 8F3695/8H5569: Metalaxyl: Tolerances for Alfalfa and for Barley as Rotational Crop. Amendment of September 1, 1989. Revised Sections B and F. No MRID No. DEB Nos. 6347 and 6348.

FROM: Joel Garbus, Ph.D., Chemist *Joel Garbus*
Tolerance Petition Section III
Dietary Exposure Branch
Health Effects Division (H7509C)

THRU: Richard D. Schmitt, Ph.D., Chief *Richard D. Schmitt*
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Health Effects Division (H7509C)

TO: Ben Chambliss / S. Lewis, PM-21
Herbicide-Fungicide Branch
Registration Division (H7505C)

CIBA-GEIGY Corporation, Greensboro, NC, had requested that permanent tolerances be established 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-dimethylphenyl)-N-(methoxyacetyl)-alanine methyl ester, each expressed as metalaxyl equivalents, in or on alfalfa and in or on barley when planted as a rotational crop to alfalfa.

DEB's review (J. Garbus, memo, 8/3/89) concluded that it could recommend for the proposed use of metalaxyl on alfalfa (with barley as a rotational crop) provided the petitioner submit:

a. a revised Section B specifying which formulation of metalaxyl was intended for this proposed use and

b. a revised Section F proposing a 6 ppm tolerance for alfalfa forage rather than 10 ppm and

c. A revised Section F for the inadvertent residues of metalaxyl in/or barley grain, forage, fodder, and straw and for barley milling fractions in rotation after alfalfa incorporating (a) the language of 40 CFR 180.408(b), 40 CFR 185.4000 (b), and 40 CFR 186.4000 (b) respectively.

Conclusion and Recommendation:

The petitioner has revised Sections B and F as requested in DEB's review of PP# 8F3695/8H5569D.

DEB can now recommend for the establishment of the proposed tolerances.

Petitioner's Response

The petitioner has responded by submitting the requested revisions to Sections B and F.

The revised Section B now refers to Metalaxyl 2E as the formulation that is intended for this use.

The revised Section F proposes tolerances for inclusion in 40CFR180.408(a) for:

Alfalfa Forage	6.0 ppm
Alfalfa Hay	20.0 ppm

The revised Section F proposes tolerances for inclusion in 40CFR180.408(b) for:

Barley, grain	0.2 ppm
Barley, fodder	2.0 ppm
Barley, forage	2.0 ppm

The revised Section F proposes tolerances for inclusion in 40CFR185.4000(b) for:

Barley Milling Fractions	1.0 ppm
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The revised Section F proposes tolerances for inclusion in 40CFR186.4000(b) for:

Barley Milling Fractions	1.0 ppm
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Comment Regarding Additional Metalaxyl Registrations:

Although the Reregistration Standard Guidance Document concludes that the nature of the residue is not understood in animals, we conclude that it is adequately understood for the purposes of this petition only. The question of the metabolism of metalaxyl in

animals will be dealt with in the petitioner's response to the Registration Standard.

Note to PM:

The petitioner has pointed out a typographical error in the wording of 40CFR186.4000(b). This section refers to feed additive inadvertent tolerances, yet the word "food" is used instead of feed. This mistake should be corrected.

cc: PP's # 8F3695/8H5569, S. File, RF., Circ., Reviewer, PMSD/ISB
RDI:PE:2/28/90:RAL:3/2/90
H7509C:DEB:JG:jg:CM:2:Rm:803:557-1405:3/5/90.



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