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

MAY 13 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCESMEMORANDUM

SUBJECT: Metalaxyl/IN900001. Resubmission for Section 24(c) registration of Ridomil®5G on cucurbits. DEB No. 7788. Barcode No. D162783. MRID Nos. 40790201 and 41636201.

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TO: Susan Lewis (PM-21)
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Background

On 5/21/90, the State of Indiana issued a 24(c) registration for the use of the fungicide Ridomil®5G on cucurbits (IN900001). Ridomil®5G is a granular formulation containing the active ingredient metalaxyl, N-(2,6-Dimethylphenyl)-N-(methoxyacetyl)-alanine methyl ester. Tolerances have been established for metalaxyl and metabolite N-(2-hydroxy methyl-6-methylphenyl)-N-(methoxyacetyl)-alanine methyl ester and metabolites containing the 2,6-dimethylaniline moiety on numerous crops, including the cucurbits at 1 ppm (40 CFR §180.408). A registration standard (FRSTR) was issued for metalaxyl in 1987.

The J. Garbus memo of 8/6/85 noted that residues resulting from applications of the granular formulation were twice as high as those resulting from applications of the emulsifiable concentrate. DEB required that residue data from proposed sites be submitted with any requests for registration of the granular formulation. DEB did not recommend in favor of the Indiana 24(c) registration (memo, C.L. Olinger, 8/24/90; DEB No. 6949) because no residue data were submitted supporting the use of the granular formulation on cucurbits. Furthermore, a letter from D. Campt (EPA) dated 9/90, addressed to the Office of the State Chemist in Indiana, alerted

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the state to the possibility of over-tolerance residues, and recommended for the cancellation of the state's subject 24(c) registration that had been issued 5/21/90.

Present Considerations

The State of Indiana has submitted a letter dated 3/4/91 in response to the cancellation of EPA SLN IN-900001. The letter cited a 2/25/91 letter from Ciba-Geigy to the state chemist, which addressed the concerns in the C.L. Olinger memo, 8/24/90. Ciba-Geigy stressed that the use rate for Ridomil®5G is one half the use rate of the emulsifiable concentrate, Ridomil®2E (EPA Reg. No. 100-607), and therefore would not be likely to result in over-tolerance residues. No data for cucurbits were submitted with the letter, but Ciba-Geigy requested that EPA consider the residue data generated by application of the granular formulation to spinach (MRID Nos. 40790201, and 41636201) in support of the 24(c) registration for cucurbits.

CBRS Comments/Conclusions

The data submitted were adequate to support the use of Ridomil®5G on spinach (memo, K. Dockter, 2/13/91, CBRS No. 7165). However, there were no bridging studies done to compare residues of metalaxyl on spinach with residues on cucurbits. There are no residue studies available in which the granular formulation was applied to any of the members of the cucurbit family. The petitioner cannot assume that reducing the application rate by one half will result in an equivalent reduction of the residues in the harvested crop.

Recommendations

CBRS does not feel comfortable using residue data from spinach to predict residues on cucurbits. Rates of uptake, translocation, and/or metabolism can vary markedly between plant families. At this time, CBRS continues to recommend against the 24(c) registration of Ridomil®5G for use on cucurbits in Indiana.

cc: CBSwartz (CBRS), Circulate (7), RF, Metalaxyl SF, Section 24
File

H7509C:CBRS:CBSwartz:CM#2:Rm 800D:703-557-1877:4/19/91

RDI:WJHazel: 5/10/91: DFEwards: 4/24/91