



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

JUN 16 1982

MEMORANDUM

Subject: Conditions of Registration for Ridomil (Metaloxyl) on tobacco

To: Director, Registration Division (TS-767C)

Background: In the initial review of metalaxyl for use against blue mold and black shank on tobacco, EFB/HED indicated that metalaxyl would potentially contaminate ground water. The conclusion was based upon the chemical's proclivity to leach in low-organic content soils and upon its persistence. For those reasons, EFB recommended against registration.

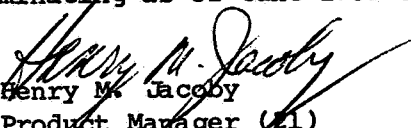
A request for conditional registration for tobacco was made, supported by the adverse economic impact blue mold would have on the crop without metalaxyl use. The potential for a blue mold outbreak was great for 1980. Therefore, a determination was made that the registration of Ridomil on tobacco was in the public interest. The product was registered with the condition that field monitoring studies be undertaken in Florida and Maryland. Monitoring results from the studies were submitted initially every 30 days. The submission interval was changed to every 60 days after initial reports showed little movement of metalaxyl.

The Florida study was terminated in February 1981 after a year of monitoring. This study was being done on a private tobacco grower's farm. Hence control of the testing site was limited. No leaching was observed at this site.

The Maryland study was carried on at the University of Maryland's tobacco experimental farm. This site was preferred by the Agency and Ciba-Geigy because of the cooperation received by Ciba-Geigy and the degree of control Ciba-Geigy had over the monitoring. Monitoring results from this site have been submitted for the past two growing seasons.

The data developed at the Maryland site indicate that metalaxyl does leach through the soil. Detectable residues of metalaxyl are reduced with time. Residues of metaloxyl at depths of greater than 18 inches did not exceed 0.01 part per million after 137 days. Residues in water from selected shallow wells did not exceed 2.1 parts per billion. Since Environmental Fate Branch has run the PESTAN leaching model, the fundamental physical and chemical data bases for metalaxyl should be adequate.

Based on the available information developed to date, I recommend that you sign the letter to CIBA-GEIGY indicating that the conditions of tobacco use registration have been met and terminating as of June 1982 the monitoring study.


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