R. M.

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

JUL 17 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM:

SUBJECT: **PP#1E4024. Metalaxyl on cranberries. Amendment to review of 10/31/91. DP Barcode D175506. HED# 2-1679. CBTS# 9537. MRID# none.**

FROM: José J. Morales, Chemist
Tolerance Petition Section II
Chemistry Branch I -- Tolerance Support
Health Effects Division (H7509C)

THROUGH: Elizabeth T. Haeberer, Section Head
Tolerance Petition Section II
Chemistry Branch I -- Tolerance Support
Health Effects Division (H7509C)

TO: Hoyt Jamerson, PM 43
Emergency Response And Minor Use Section
Registration Support Branch
Registration Division (H7505C)
and
Toxicology Branch I
Health Effects Division (H70505C)

BACKGROUND

IR-4 and the Experiment Station of New Jersey originally proposed the establishment of a tolerance for 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 methylester, each expressed as metalaxyl, in/on cranberries at 4.0 ppm. The tolerance request has been rejected by CBTS because residues from aerial applications of Ridomil 5G were higher than those from ground applications and in the Washington field trial, data from 1X application were higher than from the 2X application (J. Morales review of 10/31/91).

The petitioner has submitted supplementary information for PP#1E4024. This information consists of the Transmittal Document, dated 1/31/92, and information regarding the issues raised in the CBTS review of 10/31/91.

CONCLUSIONS and RECOMMENDATIONS

No outstanding deficiencies remain. TOX considerations permitting, CBTS recommends in favor of a 4.0 ppm tolerance for metalaxyl in/on cranberries.

DETAILED CONSIDERATIONS

The deficiencies listed in CBTS memo of 10/31/91 are outlined below followed by the petitioner's responses and CBTS comments.

CBTS Deficiency #6

We can draw no conclusion concerning the adequacy of the proposed tolerance on cranberries until the petitioner resolves the following concerns: a) why are residue levels from aerial application of Ridomil 5G higher than those from ground application?, b) why in the Washington field trial, are data from 1X application higher than from the 2X application?

Petitioner's response to Deficiency #6

The petitioner submitted a letter explaining that it is not atypical to find residues from aerial application which are equivalent to or higher than residues from ground application. Also, data from cranberries study of side-by-side ground and aerial application were submitted, in which the average 1X total metalaxyl residue for ground application was 0.053 ± 0.005 ppm (n=4) and the average 1X residue for aerial application was 0.16 ± 0.093 ppm (n=6). The petitioner claims that these results are valid and not atypical.

In the Washington field trial, initial residues were confirmed by reanalysis and the average 1X and 2X residues were 3.0 ppm and 0.80 ppm, respectively. The petitioner claims that possibly an inadvertent sample switch in the field or incorrect application of the test substance might have occurred.

CBTS Comments

Deficiency #6 is resolved. The residues observed in the field trials indicate that the 4 ppm tolerance is appropriate.

cc: SF, RF, Circu., José J. Morales, E. Haeberer, M. Flood, PP#1E4024

H7509C: Reviewer (JJM): CM#2: Rm 804-Q: 305-5010: typist (JJM): (7/16/92)

RDI: E. Haeberer (7/17/92): M. Flood (7/17/92): R. Loranger (7/17/92)