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

FEB 19 1991

**MEMORANDUM**

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**SUBJECT:** EPA Reg. No. 100-628. Ridomil 5G [metalaxyl] add use on spinach. Additional residue studies submitted 9/19/90 in response to DEB 2/14/89 review. MRID 416362-01; D156892. CBRS 7165.

**FROM:** Kenneth W. Dockter, Chemist *Kenneth Dockter*  
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**THRU:** A.R. Rathman, Section Head *ARR*  
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**TO:** Susan Lewis / Benjamin Chambles, PM Team 21  
Registration Division (H7505C)

In response to DEB [Dietary Exposure Branch] 2/14/89 review of MRID 407902-01 [L. Probst; #4809], Ciba-Geigy Corp. has submitted additional metalaxyl residue data from spinach field trials. In the aforementioned review, we stated:

"In the absence of adequate residue data, Dietary Exposure Branch is unable to conclude that the 10 ppm tolerance established to cover residues of metalaxyl and its metabolites on spinach will not be exceeded as a result of the proposed amended registration of Ridomil 5G."

and

"For a favorable recommendation, the registrant will need to generate more residue data reflecting the maximum proposed use of Ridomil 5 G on spinach, i.e., an at plant treatment using 2.0 lb. a.i./acre plus two side dress applications using 0.25 lb. a.i./acre and a 21 day PHI. Some of this required residue data will need to be generated in California."

Residue data submitted with this response were from 2 field studies conducted in CA, and 3 in TX. The data reflect residues resulting from the maximum proposed use. Data from about 2X applications [4 lb ai/A preplant + 0.5 lb ai/A side dress] were

also provided. The maximum residues reported from a 1X rate and a 21 day PHI were 4.7 and 3.0 ppm, respectively in 2nd and 3rd cuttings; and 4.9 ppm in 1st cutting [44-5 day PHI]. For comparison purposes, the maximum residue reported from a 2X rate was 22 ppm. This CA sample was taken 45 days after a 4 lb ai/A at plant treatment with no side dress applications being made.

Analytical method AG-395, with minor modifications was used to generate the residue data. This GC method for determining metalaxyl in crop samples as 2,6-dimethylaniline was previously submitted [MRID 40534803]. Recoveries reported were  $86.5 \pm 12.4\%$ , and frozen samples were stable for 18 months.

#### Conclusion and Recommendation

The available data are now sufficient to support the proposed use. Based on the submitted studies, residues of metalaxyl which may occur in spinach as a result of the proposed use would not likely exceed the established tolerance of 10 ppm. Since spinach is not a feed item, the existing meat, milk, poultry, and egg tolerances are adequate.

Therefore, we have no further objections to the proposed amended registration of Ridomil 5G to allow its use on spinach for control of Pythium damping-off and white rust.

cc: K. Dockter (CBRS), Metalaxyl Amended Use, Reg. Std., and  
Subject files, C. Furlow (PIB/FOD), RF, Circulation (7).  
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