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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#6F3337 - Metalaxyl on Strawberries. Amendment of 9/27/89. (DEB No. 5895, HED Project No. 9-2277, RD Record No. 253181)

FROM: Debra F. Edwards, Ph.D., Section Head
Tolerance Petition Section II
Dietary Exposure Branch
Health Effects Division (H7509C)

THROUGH: Richard D. Schmitt, Ph.D., Chief
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: Susan Lewis, PM 21
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In DEB's most recent review of PP#6F3337 pertaining to metalaxyl on Strawberries (M. Kovacs, 5/10/89), the following deficiency was cited:

> "The apparent discrepancies between the newly proposed use pattern described in the current revised Section B/label (1 to 2 lb ai/A/application) and that indicated in the submitted strawberry residue trials (1 lb ai/A/application) need to be addressed and reconciled by the petitioner. Also, the 'Note' on the proposed label limiting use to 2 lb ai/A/year needs to be clarified, since the use directions imply a permissible seasonal use rate of 3 to 6 lb ai/A. A revised Section B/label is needed. [The available data will support the proposed tolerance provided use is limited to a single fall application at transplanting at 1 to 2 lb ai/A, followed by two applications at 1 lb ai/A or one application at 2 lb ai/A during the growing season."]

Ciba-Geigy Corp. has responded by submitting a revised Section B proposing a maximum of three applications of metalaxyl at 1 lb ai/A for a total of 3 lb ai/A/year. The first application is to be made at transplanting followed by two during the growing season.

DEB Conclusions and Recommendations:

The remaining deficiency has been resolved. DEB now recommends in favor of the proposed tolerance of 10 ppm for the combined residues of the fungicide, metalaxyl and its metabolites containing the 2,6-dimethylaniline moiety, and N-(2-hydroxymethyl-6-methylphenyl)-N-(methoxyacetyl) alanine methyl ester, each expressed as metalaxyl, in or on the raw agricultural commodity, strawberries, dietary exposure considerations permitting.

H7509C:D. Edwards:11/89:CM#2:RM810:557-1878

RDI:R. Loranger, 11/89

cc: PMSD/ISB, R. Tomerlin (DRES/SACB), RF, PP#6F3337, Circu, Edwards(DEB)