REG. STD 9

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

JAN 22 1992

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Metalaxyl Reregistration: Ciba-Geigy Corporation: Request for Concurrence with Storage Stability Protocol: CBRS No. 8723.: No MRID: DP Barcode D169714.

FROM: William O. Smith, Ph.D., Chemist
Reregistration Section
Chemistry Branch II-Reregistration Support (CBRS)
Health Effects Division (H7509C)

THROUGH: Edward Zager, Branch Chief
Chemistry Branch II - Reregistration Support
Health Effects Division (H7509C)

TO: Carol Peterson, PM Team 74
Reregistration Branch
Special Review and Reregistration Division (H7508W)

The registrant has asked for written concurrence with the approach they have taken to satisfy storage stability data requirements as specified in the Metalaxyl Final Registration Standard and Tolerance Reassessment dated 9/23/88.

The registrant cites previously reported data demonstrating freezer storage stability of metalaxyl and metabolites individually fortified on strawberries, apples, cabbage, lettuce, and potatoes for 12 months. Another study is cited supporting the stability of weathered residues of metalaxyl in tobacco and potatoes for 18 months. A study is currently underway in which samples of peppers, potatoes, spinach, and cranberries bearing field-incurred residues of metalaxyl are being analyzed following storage intervals of up to 38 months. A meat, milk, and egg storage stability study for metalaxyl residues will also be conducted in the near future.

The registrant concludes that, assuming complete stability of total metalaxyl residues in all crops, the long-term weathered residue stability study, in concert with previously reported fortified studies, will provide a storage stability data base sufficient to bridge to all other crops for which metalaxyl has

existing or pending tolerances and ask for Agency concurrence on this conclusion.

CBRS RESPONSE

We cannot officially concur with the registrants conclusion prior to completion of studies and review of all data. We do agree with the registrant that if metalaxyl residues of concern are completely stable in all crops tested it is reasonable to allow translation of these data to support the storage stability of other crops for which tolerances are established. If all residues of concern are not stable under the conditions and time intervals incurred in obtaining data in support of tolerances, then CBRS may recommend further storage stability studies.

cc: W. Smith, Metalaxyl Reg. Std. File, SF, RF, C. Furlow (PIB/FOD).

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Chemical:	**Metalaxyl**
PC Code:	**113501**
HED File Code	**11100 Other Chemistry Documents**
Memo Date:	**01/22/1992**
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