Date Out EFB: 2 4 AUG 1981

To Product Manager 21 Jacob	PROPRIETA	
From: Dr. Willa Garner SMC. Chief, Review Section No. I Environmental Fate Branch		RY
Attached please find the environmental f	ate review of:	
Reg./File No.: 100-607		
Chemical: Metalaxyl		
Type Product: Fungicide		
Product Name: Ridomil		
Company Name: Ciba-Geigy		
Submission Purpose: Adding new use - avocados		
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ZBB Code: 3(c)(7)	ACTION CODE: 330	
Date in: 6 \$/17/81	EFB # 874	
Date Completed: 2 4 AUG 1981	TAIS (level II)	Days
Deferrals To:	62	3
Ecological Effects Branch		•
Residue Chemistry Branch		
Toxicology Branch		

1.0 INTRODUCTION

Ciba-Geigy has submitted an application for amending the registration of metalaxyl (Ridomil 2E) by adding a new use pattern on avocados. No new environmental fate data was submitted.

2.0 Metalaxyl-Ridomil 2E

N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alamine methyl ester

$$CH_3 CH_3$$

$$CH_2 CH_3$$

$$C - CH_2 CCH_3$$

$$CH_3 CH_3$$

$$CH_3 CH_3$$

3.0 CONCLUSIONS

- 3.1 Data in our file are adequate to determine environmental fate of Ridomil for the proposed use.
- 3.2 Environmental fate requirements have been satisfied in accordance with 1978 guidelines with the exception of the fish accumulation study.
- 3.3 EFB continues to be concerned about the mobility of Ridomil in soils especially sandy soils with low organic content. Continuing monitoring studies to date indicate that Ridomil has not been detected in ground-water (<0.001 ppm). (See EFB review of 6th groundwater monitoring study update, 5/26/81).

4.0 RECOMMENDATIONS

- 4.1 EFB concurs with the registration of Ridomil 2E on avocados on condition that the fish accumulation study will be satisfactorily completed during the next 12 months.
- 4.2 In addition, EFB will continue to review the ongoing groundwater monitoring studies for indications of contamination of the ground water.

NOTE TO PM

In the EFB review of 3/11/81, two environmental fate data gaps were cited: a fish accumulation study and the effects on soil microorganisms. According to the 6/15/81 draft of the guidelines, the effects of Ridomil on soil microbes is not a required study. EFB suggests that the registrant be advised not to initiate such a study unless he first checks with EPA to determine if it indeed will be required. The fish accumulation study has been addressed above (4.1).

Reladu Morale

Richard V. Moraski Review Section #1

Environmental Fate Branch/HED