



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

*Metolachlor S.F.*

JUL 24 1990

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**MEMORANDUM**

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

**SUBJECT:** Summary of telephone calls from Ciba Geigy:  
(1) Metolachlor on small grains  
(2) Metalaxyl-new formulation

**FROM:** ~~Richard Loranger~~, PhD, Chemist  
Dietary Exposure Branch

*R. Loranger*

**THRU:** Richard D. Schmitt, PhD, Chief  
Dietary Exposure Branch

*Richard D. Schmitt*

**TO:** Dietary Exposure Branch Files

On July 20, 1990 I received calls from Bob Kahrs and Karen Stumpf of Ciba Geigy concerning data requirements for metolachlor on small grains (rotational crops) and for a new formulation of metalaxyl, respectively.

With regard to metolachlor, Ciba Geigy wishes to reduce the plant back interval for small grains as rotational crops from 4 to 3 months. Corn and sorghum have tolerances to cover direct pesticide applications, while other grains (barley, buckwheat, millet, milo, oats, rice, rye, wheat) have rotational crop tolerances. The registrant anticipates having to raise the forage and fodder tolerances for the rotational crops and suggested conducting field trials on wheat (15-20) and rice (5-6) to cover the cereal grains crop group. Bob thought that data should not be needed on the other two representative commodities of the group (corn, sorghum) since they have higher tolerances (on forage and fodder) to cover direct applications. I agreed with Bob's approach and noted that the rotational crop group tolerance could be set for cereal grains except corn and sorghum. He was also advised to submit their plans in writing to the appropriate product manager for our formal review.

For metalaxyl, Ciba Geigy is planning to shift from an EC to a wettable powder in water soluble bags to avoid problems with disposal of plastic containers. In light of the rates and pre-harvest intervals being the same, Karen asked what type of residue data would be needed for this new formulation. She was told that we would probably accept a bridging data approach with side-by-side studies comparing residues from the two formulations on representative commodities such as leafy vegetables and fruits. Both foliar and soil applications should be included in

these studies, especially since some earlier studies showed some differences in residues following soil applications of EC and granular formulations of metalaxyl. Karen was advised to either set up a meeting with appropriate OPP representatives or submit a written plan of their studies for formal review.

cc: Circu (7), RF, Metolachlor SF, Metalaxyl SF, Loranger  
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