



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

APR 8 1991

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

SUBJECT: PP#1E3926 - Metalaxyl on Ginseng - Amendment of  
March 21, 1991 (DEB No. 7787)

FROM: Gary F. Otakie, Chemist *Gary F. Otakie*  
Tolerance Petition Section II  
Chemistry Branch I - Tolerance Support  
Hazard Evaluation Division (H7509C)

TO: Hoyt L. Jamerson, PM Team 43  
Registration Division (H7505C)

and

Toxicology Branch II - Herbicide, Fungicide, and  
Antimicrobial Support  
Hazard Evaluation Division (H7509C)

THRU: Elizabeth T. Haeberer, Section Head *Elizabeth T. Haeberer*  
Tolerance Petition Section II  
Chemistry Branch I - Tolerance Support  
Hazard Evaluation Division (H7509C)

Per a March 21, 1991 letter from George M. Markle,  
International Research Project No. 4, this amendment responds  
to the following deficiency noted in CBTS's review (see  
G. Otakie memo of February 22, 1991):

Deficiency

A revised Section B is needed. The Section B submitted  
is inconsistent with the proposed use directions on page 12  
of the report, which recommends that the first application be  
made with either the 2E or 2G formulation while the remaining  
4 supplemental applications be made with only the 2G  
formulation, to minimize the possibility of resistance.  
Also, if two formulations are proposed, the label must

**BEST COPY AVAILABLE**

-2-

include appropriate instructions to ensure that the combined application of the two formulations does not exceed the approved maximum application rate.

Petitioner's Response to Deficiency

The petitioner has submitted a revised Section B, which provides that the first application can be made with either the 2E or 5G formulation, and that only the 5G formulation be used for the up to four supplemental applications. Also, the following statement has been added to ensure that the combined application of the two formulations does not exceed the approved maximum application rate:

- "1. Do not apply more than a total of three lbs a.i. of metalaxyl 2E or 5G/A of ginseng/growing season,"

CBTS's Comments/Conclusions

The revised Section B is acceptable.

Recommendation

TOX considerations permitting, CBTS recommends for the proposed 3.0 ppm metalaxyl tolerance on ginseng.

cc: RF, Circ, Otakie, PP#1E3926, PIB/FOD (Furlow), R.  
Schmitt, FDA, DRES/SACB (Kariya), E. Haeberer  
Approved: E.T. Haeberer 3/28/91; R.A. Loranger 3/29/91

**BEST COPY AVAILABLE**