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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 100-628. Ridomil 5G (metalaxyl). Amended registration request to add use on head lettuce. MRID No. 407758-01. DEB No. 4808.

FROM: Linda S. Propst, Chemist *Linda S. Propst*
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Health Effects Division (TS-769C)

THRU: Andrew R. Rathman, Section Head *ARR*
Special Registration Section 1
Dietary Exposure Branch
Health Effects Division (TS-769C)

TO: Lois Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Agricultural Division of Ciba-Geigy Corporation is requesting an amended registration for Ridomil 5G to allow for its use on head lettuce for control of Pythium damping-off.

Tolerances have been established for the combined residues of the fungicide metalaxyl [N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester] and its metabolites containing the 2,6-dimethylaniline moiety, and N-(2-hydroxy methyl-6-methyl)-N-(methoxyacetyl)-alanine methylester, each expressed as metalaxyl in or on head lettuce at 5 ppm [40 CFR 180.408 (a)].

The currently registered use for metalaxyl on head lettuce allows for 1-2 lb. ai./acre of Ridomil 2E to be applied broadcast or in a band using ground equipment at planting. Broadcast applications may be soil incorporated.

Ridomil^R 5G is a granular formulation containing 5% metalaxyl.

The proposed use would allow for 20-40 lbs. Ridomil 5G (1-2 lbs.a.i.)/treated acre to be applied as a broadcast soil application and incorporated in the top two inches of soil or applied uniformly to the soil surface at the time of planting.

Ridomil 2E (EPA Reg. No. 100-607) and Ridomil 5G are registered on a number of the same crops. However, it has been

shown (see J. Garbus memo dated 8/6/85) that average residues resulting from applications of the 5G formulation are approximately 2X (average) the average residues resulting from applications of the 2E formulation when both are applied at the same rate.

Residue data submitted with this amended registration request were generated in eight lettuce growing areas in six states (California, Arizona, Michigan, New York, Texas and Florida). Data reflect residues of metalaxyl occurring on head lettuce after Ridomil 5G was applied at planting at 2.0 lbs. a.i./A followed by four foliar applications applied at 14-day intervals. For comparison purposes, Ridomil^R 5G was applied at 4 lb. a.i./acre (2X) plus four foliar applications of Ridomil MZ58 (1.6 lb. a.i./acre metalaxyl). Head lettuce samples were collected with 4-7 day PHIs for residue analysis. The maximum metalaxyl residues reported after receiving 1X and 2X the maximum recommended use rate were 3.3 ppm and 4.9 ppm, respectively.

Conclusions and Recommendations

From the residue data submitted, we conclude that the tolerance established to cover residues of metalaxyl and its metabolites on head lettuce will not be exceeded as a result of the proposed preplant incorporated or preemergence treatment with Ridomil 5G.

Therefore, Dietary Exposure Branch has no objections to the proposed amended registration.

Note to PM - This favorable recommendation to use Ridomil 5G preplant or preemergence on head lettuce does not permit subsequent foliar applications of Ridomil MZ 58. If the registrant wishes to follow up with foliar applications of Ridomil MZ58 on head lettuce, an appropriate tolerance for mancozeb on head lettuce will be needed.

cc: Reading File, Circulation, Subject File, Amended Use File,
Metalaxyl Reg. Std. File, Reviewer, Branch Chief, PMSD/ISB
RDI: A. R. Rathman, 2/9/89; E.Zager, 2/9/89
TS-769C:DEB:LSP:lsp:CM-2:Rm803C:557-7325:2/9/89



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