



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

MAY 9 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 100-664. Revised Label for Ridomil PC 11G.
No MRID No. RCB No. 3706.

FROM: Linda S. Propst, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Linda S. Propst

THRU: Andrew R. Rathman, Section Head
Special Registration Section 1
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

Ciba-Geigy previously requested an amended registration that would allow for Ridomil PC 11G to be used on beans.

Ridomil PC 11G is a granular fungicide containing 10% Penta-chloronitrobenzene (PCNB) and 1% N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester (metalaxyl).

RCB concluded (See L. Propst memo dated 1/19/88) that all residues of PCNB and metalaxyl occurring on beans as a result of the amended registration would be covered by the established tolerances for these pesticides on beans. However, RCB recommended against the proposed amended registration because of wording in the Rotation Crops Section of the label we found to be misleading. Specifically, there are no tolerances established to cover residues of PCNB on asparagus, corn, cucurbit vegetables, head lettuce, hops, legume vegetables other than beans, onions, spinach and wheat listed under Rotational Crops. These crops were listed across from "Planting Time from Last Ridomil 11G Application." RCB believed that an applicator may interpret this to mean that Ridomil PC 11G had been registered for use on all crops listed under the heading Rotation Crops.

The registrant has submitted a revised label for Ridomil PC 11G which alleviates our concerns about the misleading wording under the Rotation Crops Section. The registrant has added an asterisk beside the heading Rotation Crops and added the

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statement "These crops represent those which may be planted (rotated to) according to the interval listed following an application of Ridomil PC 11G to beans, cotton, or peanuts."

Conclusion and Recommendations

RCB reiterates its conclusions that the tolerance of 0.1 ppm established to cover the combined residues of metalaxyl in or on seed and pod vegetables and the interim tolerance of 0.1 ppm to cover residues of PCNB on beans will not be exceeded as a result of the proposed amended registration.

The revised label alleviates our concerns about Ridomil PC 11G being used on crops for which there are no tolerances for PCNB.

With the revised labeling, RCB can now recommend for the proposed amended registration to use Ridomil PC 11G on beans.

cc: Reading File, Circulation, Subject File, Reviewer,
PCNB Reg. Std. File, Metalaxyl Reg. Std. File, PMSD/ISB
RDI: A. R. Rathman, 5/9/88; R. D. Schmitt, 5/9/88
TS-769:RCB:LSP:lsp:CM-2:Rm803-C:557-7324:5/9/88