



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

P175D/ISB  
(Eldridge)  
1962

**SPECIAL**

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

DEC 11 1987

MEMORANDUM

SUBJECT: PP#7F3476/FAP#7H5524. RALLY™ (Myclobutanil).  
The Regulable Residue in Animal Commodities.  
RCB No.: N/A. MRID No.: N/A.

FROM: Maxie Jo Nelson, Chemist  
Tolerance Petition Section I  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *mjn*

THRU: Robert S. Quick, Section Head  
Tolerance Petition Section I  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C) *RM*

TO: Pam Hurley, Toxicologist  
Review Section 2  
Toxicology Branch  
Hazard Evaluation Division (TS-7669C)

As you know, RCB is in the process of conducting its review of the first permanent tolerance petition for RALLY™ (myclobutanil).

This memo is to formalize RCB's deferral to TOX Branch for a determination, based on toxicological considerations, as to which metabolites, if any, of RALLY™ (myclobutanil) warrant regulation (i.e., inclusion in the tolerance expression) in meat, milk, poultry, and eggs.

You've already received the data RCB has on dairy cow, poultry, and rat metabolism.

If there's any way in which RCB can further facilitate your review, please let me know.

As you're aware, RCB is under timeframe pressures to complete this new chemical priority review, so we would appreciate TOX's decision as soon as you can manage it.

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COB/BUD is also awaiting word from RCB about this since they will need to conduct additional method trials if some/all of these metabolites are to be regulated in animal commodities (See Attachment).

Thank you for your continued cooperation.

Attachment: Memo of 12/9/87, A. L. Jennings, Director, BUD,  
to E. F. Tinsworth, Director, RD

cc: RF, Circ, Reviewer (Nelson), PP#7F3476/FAP#7H5524, PM 21  
(Rossi), E. Budd (TOX), H. Jacoby (SPMS), D. Marlow (BUD),  
ISB/PMSD (Eldridge).

TS-769C:RCB:Reviewer(MJN):CM#2:Rm804:557-7484:typist(mjn):  
12/10/87.

RDI:SectionHead:RSQuick:12/10/87:DeputyChief:RDSchmitt(byKHArne):  
12/10/87.



**EXPEDITE**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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**SPECIAL**

*Chuck Trichilo*  
*Bob -*

*Please get together with*

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

*JOX & Advise  
on what residues  
we are concerned  
about.*

DEC - 9 1987

MEMORANDUM

SUBJECT: Rally, Tolerance Method

FROM: Allen L. Jennings, Director  
Benefits and Use Division (TS-768)

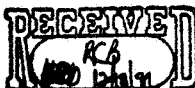
TO: Edwin F. Tinsworth, Director  
Registration Division (TS-767)

*Allen L. Jennings*  
*12/11*

The purpose of this memo is to let you know that I have a number of problems in completing the lab work on the Rally analytical method. The problems stem from recent changes and additions to the tolerance method.

The meat and milk method was started in the fall shortly after we received the validation request from RCB. The method for apples and grapes was awaiting scheduling when we learned from you in early December that it had become a high priority. We shifted laboratory priorities and are now getting started on the apple and grape residue methods. I was optimistic that we could complete both methods for the parent compound by the end of January.

However, we have just been informed that new methods for the chemical have been received by Registration Division and transmitted to Residue Chemistry. Specifically, I understand that two new methods for certain metabolites have been added for meat and milk as well as for apples and grapes. In addition, modifications have also been made to the apple and grape methodology for the parent compound. Finally, a significant revision was made to meat and milk method by changing the way the Nitrogen-phosphorus and electron capture detectors will be used with the gas chromatograph. While it is not yet totally clear which of these additions and modifications will require lab validation, it is clear that any significant revisions will delay our schedule.



I am willing to further juggle the lab priorities to meet your needs, but I need to know very soon which foods, methods, and combinations of parent and metabolite residues are needed first. Please let me know how you want to proceed.

cc: Jim Akerman