

File

4-21-93

DP Barcode : D190117
PC Code No : 113201
EEB Out : 04.21.93

To: Rebecca Cool
Product Manager 41
Registration Division (H7505C)

From: Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 93WA0014
Chemical Name : Vinclozolin
Type Product : Fungicide
Product Name : Ronilan 50DF
Company Name : Washington Department of Agriculture
Purpose : Proposed Section 18 for use on snap beans.
Also, see questions on Endangered Species from PM.

Action Code : 510 Date Due : 04/29/93
Reviewer : A. Vaughan Date In : 04/13/93

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but additional information is needed)

S=Supplemental (Study provided useful information but Guideline was not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur

DP BARCODE: D190117

CASE: 284598
SUBMISSION: S438603

DATA PACKAGE RECORD
BEAN SHEET

DATE: 04/09/93
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: EMERGENCY EXEMP ACTION: 510 SEC18-OC F/F USE
CHEMICALS: 113201 Vinclozolin

ID#: 93WA0014

COMPANY:

PRODUCT MANAGER: 41 REBECCA COOL 703-308-8417 ROOM: CS1
PM TEAM REVIEWER: LIBBY PEMBERTON 703-308-8326 ROOM: CS1
RECEIVED DATE: 04/09/93 DUE OUT DATE: 05/29/93

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 190117 EXPEDITE: N DATE SENT: 04/09/93 DATE RET.: / /
CHEMICAL: 113201 Vinclozolin
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 04/29/93 CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	4/13/93	/ /
BRAN: EEB	04/13/93	04/21/93
SECT:	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

* * * DATA REVIEW INSTRUCTIONS * * *

EEB review of 3/26/92 only indicated peregrine falcon present in treatment area. See attached list from WA which lists several more species. In the case of the Aleutian goose in OR we are limiting uses season of vinclozolin in order to reduce exposure. Would such a measure be necessary or helpful in WA?

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
190114	BAB	04/09/93	04/29/93	Y	N	N
190116	EAB	04/09/93	04/29/93	Y	N	N

EEB REVIEW

Chemical: Ronilan (Vinclozolin)

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

The State of Washington is requesting an emergency exemption (Section 18) for the use of Ronilan fungicide to control white mold and gray mold on snap beans. No new data were submitted with this request.

100.2 Formulation Information

Active Ingredient (Ronilan 50DF):
Vinclozolin: 3-(3,5-dichlorophenyl)-
5-ethenyl-5-methyl-2,4-
oxazolidinedione 50%
Inert Ingredients 50%

100.3 Application Methods, Directions, Rates

Application rate is 1.0 lb Ronilan 50DF (0.5 lb ai) per acre, maximum of two applications. Product may be applied by ground only.

100.4 Target Organisms

Target organisms are white mold, Sclerotinia sclerotiorum, and gray mold, Botrytis cinerea.

101 Hazard Assessment

101.1 Discussion

The State of Washington is requesting an emergency exemption for the use of Ronilan (vinclozolin) to control white mold and gray mold in snap beans. Maximum application rate is 0.5 lb ai per acre, with two applications allowed. Total acreage to be treated is 1,000 acres in Whatcom County.

101.2 Likelihood of Adverse Effects on Nontarget Organisms

Terrestrial Organisms

Data previously reviewed in EEB indicate that vinclozolin is practically nontoxic to birds on both an acute oral basis and a dietary basis. The available data on rats suggest that the chemical also has a low mammalian acute toxicity. Thus, significant acute hazards to populations of nontarget terrestrial organisms are not anticipated from the proposed use at 0.5 lb ai/acre.

Data from an acute contact study with honey bees indicate that vinclozolin is practically nontoxic to bees. No hazard is anticipated from the proposed use.

Our major concern with vinclozolin is potential chronic hazard to birds. Data on avian reproduction suggest that the chemical may affect egg fertility at a dietary concentration of 5 ppm.

Following an initial application at 0.5 lb ai/acre, estimated residues on avian food items would range from 3.5 ppm on fruit to 120 ppm on short grass. Although these residues are well below acute toxicity triggers for birds, they exceed reproductive effect levels on most avian food items.

The registrant (BASF Wyandotte Corp.) is currently conducting a special avian reproduction study to more clearly assess chronic effects of vinclozolin in birds. Until this study is submitted and evaluated, EEB cannot assess avian reproduction hazard under the proposed exemption. However, the following points apply:

1) On the basis of information already reviewed, there is significant potential for vinclozolin to affect reproduction in birds exposed to the chemical via residues on food items. Use under the proposed exemption will result in residues which exceed the level at which effects on avian reproduction have been noted.

2) By way of mitigating the impact, maximum acreage to be treated under the exemption is 1,000 acres. Also, use on bean fields does not represent a high exposure situation for birds.

Aquatic Organisms

Data from previous EEB reviews indicate that vinclozolin is no more than moderately toxic to freshwater fish (bluegill LC50 > 3.4 mg/L; rainbow trout LC50 > 2.84 mg/L). LC50 for Daphnia magna was determined to be 3.65 mg/L, indicating moderate toxicity.

Rough calculation of an aquatic EEC (see attached) provides a value of 3.05 ppb in a pond 6 foot deep, residues being derived from runoff. This EEC value is well below any hazard triggers for freshwater organisms. Thus, use under the proposed exemption is not expected to adversely affect nontarget aquatic organisms.

Nontarget Plants

Data from tests with 5 aquatic plant species indicated less than a 50% detrimental effect, as compared to controls, for all test species. Use under the proposed exemption is not expected to adversely affect nontarget plants.

101.3 Endangered Species Considerations

As noted above, the primary concern with vinclozolin relates to potential reproductive impairment in birds. EEB's Endangered Species files show the bald eagle, marbled murrelet, spotted owl, and peregrine falcon as endangered bird species listed for the subject county. Hazard to these species should be negligible, as use on snap beans represents a minimal exposure situation for these species.

On the basis of toxicity data and estimated EEC's, hazard to listed non-avian species is not anticipated.

101.4 Adequacy of Toxicity Data

The existing database is adequate to assess hazards to nontargets under the proposed exemption, except for reproductive hazard to birds. Chronic hazard to birds cannot be assessed until the avian reproduction testing is completed.

103 Conclusions

EEB has reviewed the proposed emergency exemption for the use of Ronilan (vinclozolin) on snap beans. EEB concludes that the proposed use may represent a reproductive hazard to birds, although use on beans represents a low exposure situation. Hazard to other nontargets is not anticipated.

There are no federally listed endangered/threatened species in Washington that will be adversely affected by the proposed use.

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Norman J. Cook 04.20.93
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Anthony F. Maciorowski 4/23/93
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EEC CALCULATION SHEET

I. For un-incorporated ground application

A. Runoff

$$0.5 \text{ lb(s)} \times \frac{0.01}{(1\% \text{ runoff})} \times 10 \text{ (A)} = \frac{0.05}{(\text{tot. runoff drainage basin})} \text{ lb(s)}$$

EEC of 1 lb a.i. direct application to 1 A. pond 6-foot deep = 61 ppb

Therefore, EEC = 61 ppb x 0.05 (lb) = 3.05 ppb

II. For incorporated ground application

A. Runoff

$$\text{___ lb(s)} \div \frac{\text{___ (cm)}}{(\text{depth of incorporation})} \times 0.0 \times 10 \text{ (A)} = \text{___ lb(s)} \frac{(\% \text{ runoff})}{(10 \text{ A. tot. runoff d. basin})}$$

Therefore, EEC = 61 ppb x ___ (lbs) = ___ ppb

III. For aerial application (or mist blower)

A. Runoff

$$\text{___ lb(s)} \times \frac{0.6}{(\text{appl. efficiency})} \times \frac{0.0}{(\% \text{ runoff})} \times 10 \text{ (A)} = \text{___ lb(s)} \frac{(\text{tot. runoff d. basin})}{(10 \text{ A. tot. runoff d. basin})}$$

B. Drift

$$\text{___ lb(s)} \times \frac{0.05}{(5\% \text{ drift})} = \text{___ lb(s)} \text{ (tot. drift)}$$

$$\text{Tot. loading} = \frac{\text{___ lb(s)}}{(\text{tot. runoff})} + \frac{\text{___ lb(s)}}{(\text{tot. drift})} = \text{___ lb(s)}$$

Therefore, EEC = 61 ppb x ___ (lbs) = ___ ppb