

3-9-94

DP Barcode : D199479
PC Code No : 113201
EEB Out : MAR 9 1994

To: Rebecca Cool
Product Manager 41
Registration Division (7505C)

From: Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (7507C)

Attached, please find the EEB review of...

Reg./File # : 94OR0007
Chemical Name : Vinclozolin
Type Product : Fungicide
Product Name : Ronilan 50DF
Company Name : Oregon Department of Agriculture
Purpose : Section 18 request for use on snap beans.

Action Code : 510 Date Due : 03/08/94
Reviewer : H. Mansfield Date In : 02/18/94

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)		
21-5(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: D199479

CASE: 285410
SUBMISSION: S458499

DATA PACKAGE RECORD
BEAN SHEET

DATE: 02/16/94
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: EMERGENCY EXEMP ACTION: 510 SEC18-OC F/F USE
RANKING : 75 POINTS (A)
CHEMICALS: 113201 Vinclozolin

ID#: 94OR0007

COMPANY:

PRODUCT MANAGER: 41 REBECCA COOL 703-308-8417 ROOM: CS1
PM TEAM REVIEWER: LIBBY PEMBERTON 703-308-8326 ROOM: CS1
RECEIVED DATE: 02/15/94 DUE OUT DATE: 04/06/94

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 199479 EXPEDITE: N DATE SENT: 02/16/94 DATE RET.: / /
CHEMICAL: 113201 Vinclozolin
DP TYPE: 001 Submission Related Data Package

CSF: N LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 03/08/94
DIV : EFED	02/18/94	/ /	NEGOT DATE: / /
BRAN: EEB	02/18/94	/ /	PROJ DATE: / /
SECT:	/ /	/ /	
REVR :	/ /	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

You will recall the controversy last year over the Aleutian Goose. We imposed ground only, disking crop residues, and a 9/20 cutoff. Oregon is now proposing that the first aren't necessary and asking for a 9/16 cutoff. See OR's supporting data, attached. Please comment ASAP and indicate any restrictions needed for approval.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

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

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
199474	BAB	02/16/94	03/08/94	Y	N	Y
199477	EAB	02/16/94	03/08/94	Y	N	Y



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

MAR 9 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 1994 Section 18 for the Use of Vinclozolin on Snap Beans in Oregon

FROM: Anthony F. Maciorowski, Chief
Ecological Effects Branch
Environmental Fate and Effects Division (7507C)

TO: Rebecca Cool, PM 41
Registration Support Branch
Registration Division (7507C)

Background

In response to the Oregon Department of Agriculture's 1993 request for a Section 18 for the use of vinclozolin on snap beans, EEB proposed that (1) applications be ground only and (2) there be an early August cutoff for applications. Although these measures would reduce the risk that the geese may incur from vinclozolin the reduction of risk could not be quantified. 114 days between the last application and the arrival of the geese would be necessary to reduce expected residues below the Level of Concern (LOC).

An informal consultation with Maura Naughton and Roy Lowe of the USFWS in Oregon indicated that the geese winter in Multnomah, Yamhill, Washington, Polk, Marion, Benton, Lane, Douglas, Linn, Tillamook (unique subpopulation), Lincoln, Coos, and Curry counties. Migratory geese are seen along the river at the Coos and Curry line and the Willamut valley. EEB noted that restricting the use of vinclozolin from these counties would eliminate exposure to the geese.

When planting was delayed, Oregon requested that the Section 18 be extended to September 10, 1993, EEB concluded that the extension should not increase the risk to the geese as long as the bean residues were made inaccessible by disking.



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Current Proposal

This year's emergency exemption request is for ground and aerial application in Benton, Clackamas, Lane, Linn, Marion, Polk, Umatilla, Washington, and Yamhill counties with a cutoff date of September 16, 1994.

New Data

Two avian reproduction studies currently in review produced NOECs of 125 ppm and 50 ppm for the mallard duck and the bobwhite quail, respectively. Consequently, the LOC for avian reproduction remains the same (50 ppm).

In a phone call with the USFWS on March 1, 1994, Roy Lowe confirmed that the geese sightings for 1994 are similar to those of last year. In addition, he noted that small populations of geese winter in the Willamette Valley.

Conclusion

Again, the available data indicate that the Aleutian Canada Goose may be affected by the use of vinclozolin on snap beans in Oregon. Calculations indicate that approximately 114 days are necessary between the last application and the arrival of the geese so that expected residues do not exceed the LOC. Or, if applications are restricted from Yamhill, Washington, Polk, Marion, Benton, Lane, and Linn counties, the geese should not be exposed. If neither of these mitigation measures are feasible, aerial applications should be prohibited and the crop residues should be disked under.