



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

SEP 16 1988

9-16-88
RF
OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Inquiry of California Vegetable Specialities (CVS), Inc. regarding the use of Vinclozolin (Ronilan®) on Belgian endive Roots in California. (No Acc. number, RCB #4282).

FROM: W. T. Chin, Chemist *W. T. Chin*
Tolerance Petition Section III
Dietary Exposure Branch
Health Effects Division (TS-769)

THRU: Philip V. Errico, Section Head *Philip V. Errico*
Tolerance Petition Section III
Dietary Exposure Branch
Health Effects Division (TS-769)

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

and

Toxicology Branch
Health Effects Division (TS-769)

BACKGROUND

In connection with PP#8E3620, DEB has recommended for the establishment of a tolerance for vinclozolin, 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione, and its metabolites containing the 3,5-dichloroaniline moiety in or on the raw agricultural commodity Belgian endive (chicory) tops at 5 ppm for the control of Sclerotinia. The proposed tolerance is to permit the importation of vinclozolin-treated Belgian endive tops from Belgium to the United States. This request was for a tolerance for Belgian endive tops grown in soil.

PM #21 (Lois A. Rossi) told DEB (W. T. Chin) on 9/12/88 that this tolerance will be published in Federal Register within 3 weeks. Currently, PM #21 asks DEB to consider if we could accept a domestic use of vinclozolin on Belgian endive, as proposed by the CVS, Inc., in connection with the pending tolerance on Belgian endive tops.

CURRENT CONSIDERATIONS

Richard Collins of CVS submitted a cover letter dated 8/18/88 and six pages of documents regarding the culture of Belgian endive. CVS inquires if the pending tolerance on imported Belgian endive tops will permit them to apply 20 grams of Ronilan® per metric ton of chicory roots in California. The submitted documents indicate that Belgian endive can be cultured in four ways: (1) outdoors in pits, (2) outdoors under a layer of earth, (3) inside large, dark buildings and under a layer of earth, and (4) the most important way, in water and in dark buildings. No proposed label from the registrant (BASF) was submitted in this package.

Through telephone calls, DEB (W. T. Chin) received the following additional information:

From Richard Collins of CVS on 8/31/88:

- (1) They will use Ronilan® WP containing 50% vinclozolin for treatment.
- (2) Only the Belgian endive roots will be treated before the storage period and the treated roots will not be consumed.
- (3) The Belgian endive tops germinated from the vinclozolin-treated Belgian endive roots will be sold commercially but will not be treated.

From BASF Corporation on 9/13/88:

- (1) BASF Corporation is manufacturing two vinclozolin formulations: Ronilan® WP (50% by weight) and Ronilan® FL (500 g a.i./liter).
- (2) Neither of these formulations are registered or sold for use on Belgian endive in this country.

DEB'S CONCLUSIONS/RECOMMENDATIONS

1. DEB cannot recommend translating the foreign use residue data to a domestic use of vinclozolin on Belgian endive, as proposed by CVS, Inc. The Belgian residue data can be used as supplemental data, but we will need residue data generated under domestic soil and/or hydroponic conditions. We have no data in the file for Belgian endive grown hydroponically.
2. Residue data should be generated using formulations for which a Belgian endive registration is requested.
3. A proposed label for the domestic use should also be submitted by the registrant.

cc: Circu., RF, W.T.Chin, PMDS/ISB, Agriculture file

RDI: P.V.Errico(9/15/88):R.D.Schmitt(9/15/88)

TS-769: DEB: CM2: RM812:557-4352: W.T.Chin,wc(9/16/88)