



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

3-18-92

MAR 18 1992

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: EVALUATE REVISED LABEL REDUCING WORKER EXPOSURE AND
DELETING PLUMS AND PRUNES FOR RONILAN WP, DF, AND FL(HED
PROJECT NOS. 1-0269A, 1-0288, 1-0289)

TO: Susan Lewis, PM 21
Fungicide-Herbicide Branch
Registration Division (H7505C)

FROM: Bruce F. Kitchens, Chemist *Bruce F. Kitchens*
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Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

THRU: Mark I. Dow, Ph.D., Section Head *Mark I. Dow*
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Please find below, the OREB review of:

HED Project No.: 1-0269A, 1-0288, 1-0289

Caswell No.: 323C

Pesticide Chemical Code: 113201

EPA Reg. No.: 007969-00053, -00085, -00062

EPA MRID No.: _____

Review Time: 3 DAYS

Company Name: BASF CORPORATION

I. INTRODUCTION:

OREB has been requested to evaluate a label revision for the formulated products Ronilan® WP, Ronilan® DF, and Ronilan® FL. With this label revision the registrant proposes to lower worker exposure by adding a personal protective equipment (PPE) statement and removing the uses for plums and prunes. The registrant's proposed PPE statement reads as follows:

Application with airblast equipment must be from an enclosed tractor cab or the applicator must wear a protective suit of one or two pieces that covers all parts of the body except the hands and feet. Wear chemical resistant gloves, and chemical resistant shoes, shoe coverings, or boots, and a chemical resistant hat, and a pesticide mask or respirator jointly approved by the Mine Safety and Health Administration (MSHA) and the National Institute for Occupational Safety and Health (NIOSH).

Ronilan® is a fungicide which contains the active ingredient vinclozolin in formulations of 50%, 50%, and 41.3% respectively for the wettable powder, the dry flowable, and the flowable. Maximum application rate for all uses and formulations is 2 lbs./acre.

Vinclozolin is classified as a tox category IV chemical for acute oral toxicity with an LD₅₀ of > 10g/kg (highest dose tested) and as a tox category III chemical for acute dermal toxicity with an LD₅₀ of > 2.5g/kg (HDT). The tox concern of note is pseudohermaphroditism or a decreased anal-genital distance in male fetuses.

II. DISCUSSION

The registrant's request for deletion of use on prunes and plums is addressed by the Registration Division and the Chemistry Branch of the Health Effects Division.

In light of the potential for skin sensitization, OREB does not object to the addition of the proposed label statement to reduce worker exposure. However, one issue does arise concerning inhalation exposure. The label language which describes a pesticide mask or respirator jointly approved by the Mine Safety and Health Administration (MSHA) and the National Institute for Occupational Safety and Health (NIOSH) appears to be ambiguous. The pesticide mask could range from a simple dust mask to a dust/mist filter respirator. In addition to clarifying the inhalation PPE statement the registrant should specify the MSHA/NIOSH approval number prefix on the label.

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III. CONCLUSIONS/RECOMMENDATIONS:

OREB concludes that worker exposure will be reduced by the use of the personal protective measures outlined in the proposed label amendment. At this time the possible exposure reduction cannot be quantitatively determined as the registrant has not submitted the applicator exposure study from the proposed protocol reviewed by Steven M. Knott on 1/4/91.

OREB recommends that the registrant be informed of the issue concerning the pesticide mask in the label language contained in the proposed amended label.

cc: B. Kitchens
Chemical File: VINCLOZOLIN
Circulation
Correspondence