



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

RF
8-19-88

AUG 19 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#8E3620: Vinclozolin in/on Chicory Tops. Amendment of 6/24/88 (No Acc. number, RCB #4054).

FROM: W. T. Chin, Chemist
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

W. T. Chin

THRU: Philip V. Errico, Section Head
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Philip V. Errico

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

SUMMARY OF DEFICIENCY REMAINING TO BE RESOLVED None

RECOMMENDATION

TOX considerations permitting, RCB recommends for the establishment of a tolerance for the combined residues of the fungicide 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 chicory tops (Belgian endive) at 5 ppm for the importation to the U.S.A.

BACKGROUND

BASF Corporation has proposed a 5 ppm tolerance for the combined residues of the fungicide vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety in or on the raw agricultural commodity chicory tops (Belgian endive) for importation to the U.S.A. RCB has recommended against this request because of the reasons identified in Conclusions "1b", "4a" and "4b" of W. T. Chin's 5/17/88 memo.

PRESENT CONSIDERATIONS

In response to the deficiencies identified above, the petitioner submitted an amendment dated 5/17/88. The deficiencies are restated below, followed by the petitioner's responses and RCB's comments/conclusions.

Deficiency "1b"

"The original label is published in the Belgian language. If dipping treatment is proposed in this petition, it should be so stated and the preparation of dipping solutions should be specified in a revised Section B. In addition, the following restriction should be added to the label: "One application per season only."

The Petitioner's Response to Deficiency "1b"

"The original label was published in the Belgian language and a translation was provided. No "dipping" application is on the label and none is proposed, the material is to be applied by spray.

The Belgian label makes no provision for any application subsequent to the one prescribed. Allowed multiple applications must be specified on the label. Please refer to the translated label provided in Section B of petition No. 8E3620 directions for use on strawberries, beans, tomatoes, onions, stonefruits etc., which show acceptable instructions for multiple applications. This labeling confirms to the requirements of the Belgian regulatory authorities."

RCB's Comments/Conclusion

In connection with PP#8E3620, residue data generated from chicory samples treated with Ronilab® FL by both dipping and spray techniques were submitted for review. Since only spray treatment was mentioned in Section B, RCB, therefore, had to make it clear whether dipping treatment is involved or not. RCB concludes that the residue data generated from both dipping and spray treatments are adequate to support the proposed tolerance; the petitioner's response to this deficiency is acceptable; and deficiency "1b" has been resolved.

Deficiency "4a"

"The petitioner is requested to revise Section F by clarifying whether the proposed tolerance covers chicory tops only, chicory roots only, or both chicory tops and roots."

The Petitioner's Response to Deficiency "4a"

"Three (3) copies of a revised Section F are enclosed. The proposed tolerance is for chicory tops only, as they are the export commodity."

RCB's Comment/Conclusion

RCB concludes that deficiency "4a" has been adequately resolved.

Deficiency "4b"

"The term 'chicory samples' is used for the description of residue analysis in the section of 'Residue Data'. The petitioner is requested to clarify whether chicory tops, chicory roots, or both chicory tops and roots were analyzed."

The Petitioner's Response to Deficiency "4b"

"The data referred to in the section 'Residue Data' was abstracted from the report 'Magnitude of Residue of Vinclozolin and Metabolites in Chicory' which was assigned MRID No. 405429-01. The data contained in this report reflect the analysis of chicory tops only."

RCB's Comment/Conclusion

RCB concludes that deficiency "4b" has been adequately resolved.

cc: Circu., RF, PP#8E3620, W.T.Chin, PMDS/ISB, TAS (K. Arne)

RDI: P.V.Errico(8/18/88):R.D.Schmitt(8/18/88)

TS-769: RCB: CM2: RM812:557-4352: W.T.Chin,wc(8/18/88)