



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

APR 29 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-WA-13. Proposed Section 18 exemption for the use of vinclozolin (Ronilan) on grapes in Washington State.

FROM: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Edward Zager

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

CT

TO: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The State of Washington Department of Agriculture requests a Section 18 exemption for the use of vinclozolin (3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione, Ronilan) to control Botrytis bunch rot on grapes in Washington State. Only 30 acres of grapes will be treated under this exemption.

PP#1E2457 proposing a tolerance of 6 ppm for residues of 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione and its metabolites containing the 3,5-dichloroaniline moiety in or on table grapes is currently in reject status due to chemistry questions relating to the use of grapes and its byproducts as feed items.

The proposed use would permit a maximum of 5 applications at the rate of 5 applications at the rate of 1 lb act/A with a 21-day PHI.

Residue data submitted in connection with PP#1E2457 reflect studies conducted in Canada, France, Germany, England, Italy, Spain and South Africa.

Following 2-5 applications at the rate of 0.67 - 1.12 lbs act/A residues ranged from 0.4-5.8 ppm in or on grapes at PHI's of 21-22 days. The value of 5.8 ppm resulted from 4 applications at a rate of 0.67 lb act/A.

Based on the above data we estimate that residues of vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety will not exceed 10 ppm in or on grapes as a result of the proposed use.

Raisins are not produced from grapes grown in Washington.

Meat, Milk, Poultry and Eggs

Mary Touhey of the Washington State Department of Agriculture has assured us (telecon, 4/27/82) that the grape pomace from the 30 acres of grapes treated under this exemption will not be fed to livestock.

Thus provided a restriction against the feeding to livestock of grape pomace derived from treated grapes is added to the Section 18 label, there will be no feed items involved in this use and consequently no problem with secondary residues in meat, milk, poultry and eggs.

Conclusions

1. Residues of vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety will not exceed 10 ppm in or on grapes as a result of the proposed use.
2. Provided a restriction against the feeding to livestock of pomace derived from treated grapes is imposed on this use, there will be no problem of secondary residues in meat, milk, poultry and eggs.

Recommendation

TOX considerations permitting and provided a restriction against feeding grape pomace derived from treated grapes to livestock is added to the Section 18 label, we have no objections to the proposed Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated grapes in commerce.

cc: Ronilan (Vinclozolin) S.F.
Section 18 S.F.
Circu
Reviewer
TOX

RDI:Section Head:RJH>Date:4/28/82:RDS>Date:4/28/82
TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM:#2:RM:810>Date:4/29/82