

6-29-92



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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: REQUEST FOR ESTIMATES OF USE OF RONILAN ON REGISTERED CROPS.
DP BARCODE#: D179241.

TO: Janet Anderson, Branch Chief
Biological Analysis Branch
Biological and Economics Analysis Division (H7503W)

FROM: Shanaz Bacchus, Chemist *Shanaz Bacchus*
Special Review and Registration Section
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

THRU: Steven M. Knott, Acting Section Head *Steven M. Knott*
Special Review and Registration Section
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

Larry Dorsey, Acting Chief *Larry Dorsey 6/29/92 ✓*
Occupational and Residential Exposure Branch
Health Effects Division (H7509C)

BASF has submitted a study in response to a request for worker exposure data for Ronilan WP and DF (vinclozolin). Aerial, ground boom and airblast applications were used to generate the data. In order to complete the worker exposure assessment, OREB will need use information.

Our concerns relate to application rates, use sites, and methods of application which increase exposure to workers. Of particular interest to us are two use sites, turf and ornamentals. We have observed that the rate of application on turf is high (5.5 lb ai/A) and that ornamentals are treated with thermal fogging. Application of the fungicide to these sites may result in unacceptable worker exposure. We are enclosing recent labels (EPA Reg. Nos. 7969-53, 7969-62, 7969-85) for your information.

Since TOX has expressed concern about both acute developmental and chronic effects of the fungicide, we will need information on:

- typical use sites at the maximum and typical use rates for the registered uses;

- the amounts of the pesticide which the mixer/loader and applicator are likely to handle per day and per year.

I have discussed the problems with Dennis Szuhay who has been the BEAD contact on vinclozolin. We both feel that a meeting to discuss resource allocation and the kind of information we need from you will be useful.

Thank you for your kind cooperation in this matter. If you have any further questions, please call me at 305-7775.

cc: Dennis Szuhay BEAD/BAB H7503W
Paul Lewis BEAD/BAB H7503W
Shanaz Bacchus OREB/HED H7509C
Correspondence File
Ronilan (Vinclozolin) File