



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

AUG 4 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: 83-OR-18. Proposed Section 18 exemption for the use of vinclozolin on snap beans in Oregon.

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

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

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The State of Oregon has requested to amend its Section 18 exemption for the use of vinclozolin on snap beans to reduce the PHI from 17 to 9 days.

The revised use would allow two aerial or ground applications at the rate of 0.5 lb act/A with a 9 day PHI. As previously recommended (E. Zager's memo of 4/20/83) a restriction against feeding treated snap bean vines and hay to livestock should be imposed on this use.

Residue data reviewed in the above cited memo reflect 3 studies from OR and ID. Following 2 applications at the rate of 1lb act/A (2X the maximum proposed application rate) residues of vinclozolin and its 3,5-dichloroaniline containing metabolites were 0.42 ppm in or on snap beans at a 9 day PHI and ranged from 0.24-0.68 ppm at PHI's of 16-17 days.

Based on these data reflecting exaggerated application rates we estimate that residues from the proposed use will not exceed 1 ppm in or on snap beans.

Meat, Milk Poultry and Eggs

Provided a restriction against feeding treated snap bean vines and hay to livestock is imposed on this use, there will be no problem with secondary residues in meat, milk poultry and eggs.

Additional head lettuce residue data have been submitted with pp#2F2762. Residue experiments were carried out in New York, California, Florida, and Texas. "Total residues" as a result

Conclusions

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

Recommendation

TOX considerations permitting and provided a restriction against feeding treated snap bean vines and hay to livestock is imposed on this use, we have no objections to the issuance of this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated beans in commerce.

TS-769:RCR:E.Zager:cdw:CM#2:Rm810:X77324:8/2/83
cc: Vinclozolin S.F., Section 18 S.F., F.F., Circu., TOX Edward Zager
RDI: R. Hummel, 8/2/83; R. Schmitt, 8/2/83

Agreement should be made with FDA regarding the legal status of the treated commodities in commerce.

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cc: Sect. 18 SF., Circu., Metalaxyl SF., E. Zager
RDI: R. Hummel, 8/2/83; R. Schmitt, 8/2/83

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