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

MAR 8 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-NY-01. Proposed Section 18 exemption for the use of Ronilan (vinclozolin) on grapes in New York 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)

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The New York State Department of Environmental Conservation 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 buch rot on grapes in New York State.

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 by-products as feed items.

The proposed use would permit up to 3 applications at 14 day intervals beginning when berries reach an average of 5% sugar. Applications will be made by ground equipment at the rate of 2 lbs of Ronilan 50W (1 lb act) in 200 gals of water per acre. The use of a spreader sticker is recommended.

The metabolism of Ronilan in plants was discussed in our review of PP#1E2457 (John H. Onley, 4/27/81). The residue of concern in grapes is the parent compound plus the metabolites containing the 3,5-dichloroaniline moiety.

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

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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, at a 21 day PHI, as a result of the proposed use.

Raisins are not produced from grapes grown in New York State.

Meat, Milk, Poultry and Eggs

The possible feed item, grape pomace, is not used for livestock feed in New York but is returned to the vineyards and spread on the soil.

Consequently, there are no feed items involved in this use and there will be 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 at a 21 day PHI.

2. The proposed use will not lead to secondary residues in meat, milk, poultry and eggs.

Recommendation

TOX considerations permitting and provided a 21-day PH is imposed on this use, we have no objections to this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated grapes in commerce.

cc: Vindozolin S.F.
Section 18 S.F.
Circu
Reading file
Reviewer

TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM#2:RM:810:Date:3/8/82
RDI:Section Head:RJH:Date:3/3/82:RDS:Date:3/3/82