

Appendix A. Vinclozolin Use verification memo (from the Special Review and Reregistration Division)



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

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

MEMORANDUM

PC Code: 113201

SUBJECT: Verification Memorandum for (Vinclozolin) for Red Legged Frog Assessment

FROM: James Parker, Chemical Review Manager
Special Review Branch or Reregistration Branch 1
Special Review & Reregistration Division (7508P)
AND
Mary Waller, Product Manager
Fungicide Branch, Registration Division (7505P)

THRU: Laura Parsons, Team Leader
Special Review Branch or Reregistration Branch 1
Special Review & Reregistration Division (7508P)

TO: Rafael Prieto
Usage and Label Use Team
Biological Economic and Analysis Division (7503P)

This memorandum serves to provide additional information on the use pattern of Vinclozolin not captured in the LUIS process. RD and SRRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and SRRD.

SRRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED Spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification" section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

Finally, if further clarification is needed please contact James Parker and Mary Waller.

¹ This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain: 1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active California special local needs (SLN) registrations.

Registration and Reregistration Verification

Date and Scope of the RED

- The RED for Vinclozolin was signed in October 2000.
- The RED only assessed Vinclozolin (PC 113201, CAS 50471-44-8)
- Vinclozolin's tolerance reassessment that was conducted in conjunction with the RED included 3,5 dichloroaniline (3,5 DCA), N, -(3,5 dichloroanilide) (BF352-25) and mentioned metabolites B and E.

Required Through the RED Process

- As a result of the reregistration process, all domestic food uses except turf and canola.
- Total seasonal rate reduced from 5.5 lbs ai/acre/year to 4lbs lbs ai/acre/year
- The number of allowable applications was reduced from 4 to 3 times per year
- BASF restricted the area of the golf course which can be applied to tee boxes, greens, and turf mowed at 1" or less.
- Use on sod was restricted to sod produced for golf course landscape only.
- All mitigation has not yet been applied to the label because current labels still refer to lettuce and bean use, both of which have a last day of sale and distribution of 7/15/2005 and a final legal use date of 9/30/2005 per 65 FR 64051(OPP-64051 FRL 6744-2).
- The Vinclozolin LUIS report is not a "Data Doer Only" report and includes all active Section 3 registrations and all California Section 24 (c) registrations for Vinclozolin.

Product Reregistration

- Product reregistration was completed on 7/18/2006

Registration Division Review

- The SLN was cancelled on 7/18/2006
- There are no pending new uses for Vinclozolin
- There are no pending registrations or registrations issued since the 12/01/2008

Summary Report

Registration #	Name	Restricted Use Product	Percent Active Ingredient	Active Ingredient
7969-57	RONILAN MANUFACTURERS' CONCENTRATE	N	96	Technical Chemical
7969-85	RONILAN EG FUNGICIDE	N	50	Water Dispersible Granule
7969-224	CURALAN EG	N	50	Emulsifiable Concentrate