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

MAR 31 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP# 9G2204. BAS 352F (RONILAN®) on stone/fruits.

FROM: William L. Anthony, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
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TO: Henry Jacoby, P.M. No. 21
Herbicide-Fungicide Branch
Registration Division (TS-767)

This amendment (12/29/82) is in response to the deficiencies listed in our review of March 18, 1982 (See memo from H. Jacoby to D. Yoder, April 7, 1982). (1) residues in/on cherries, plums, and peaches are likely to exceed the proposed tolerances of 4 ppm, 1 ppm, and 4 ppm, respectively at a 3 day PHI; (2) in the absence of data for dried prunes the use should be limited to plums and fresh prunes; (3) a label restriction is needed against grazing or feeding of cover crops grown in treated orchards to livestock.

In response, the petitioners have submitted: (a) revised Section B limiting the use to - cherries, peaches, plums, fresh prunes, nectarines and apricots; (b) a label restricting livestock grazing or feeding on cover crops grown in treated orchards; (c) a revised Section F proposing a 25 ppm tolerance for residues of BAS 352F and its metabolites containing the 3,5-dichloroaniline moiety in/on cherries, peaches, plums, fresh prunes, nectarines, and apricots.

Since a permanent tolerance for residues of BAS 352F (RONILAN®), 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione and its metabolites containing the 3,5-dichloroaniline moiety in/on lettuce at 10 ppm was established in connection PP# 2F2595, the use direction and temporary tolerance proposal for lettuce have now been withdrawn.

The new EUP (No. 7969-EUP-13) requests testing of 7,308 lbs. a.i./8400 acres per one season in 25 states.

## Detailed Considerations

### Proposed Use

The stonefruits - cherries, peaches, plums, fresh prunes, nectarines and apricots may receive up to seven applications of 0.5 lb. act/100/gal/A on a dilute spray basis not to exceed 1 lb. act/A. The first two applications at a 14 day interval may be followed by three applications at 7 to 10 day intervals. Two additional applications may be made 21 days and 10-14 days before harvest. There is a 3 day PHI.

### Residue Data

No new residue data have been submitted with this amendment. All data had been previously submitted in PP# 9G2204 and have been discussed in our review. (memo: 3/18/82, W. L. Anthony)

### Cherries

Residue data reflect 6 studies from CA, MI, NY (2) and OR (2). Following 1-6 applications at rates ranging from 0.75-3 lbs. act/A residues of BAS 352F and its 3,5-dichloroaniline containing metabolites ranged from 0.87 ppm - 14.8 ppm at a 0 day PHI (3 applications of 0.75 lb. act/A). The only residue value (0.78) reported at the proposed 3-day PHI reflects 3 applications of 0.75 lb. act/A.

Based on the above data we conclude that the proposed 25 ppm temporary tolerance for residues of BAS 352F and its 3,5-dichloroaniline containing metabolites in or on cherries will be adequate to cover residues resulting from the proposed use.

### Peaches, Nectarines and Apricots

Residue data reflect 15 studies from AL, AK, CA (5), GA, MI (2), NJ, OR, PA, SC, TN and TX. Following 1-12 applications at rates ranging from 0.25-1 lbs. act/A residues in or on peaches, nectarines and apricots ranged from <0.05 to 27.5 ppm. The highest residue value reflects 9 (vs proposed 7) applications at the 1 lb. act/A (1X rate) and a 1 day (vs the proposed 3 day) PHI.

Based on the above data we conclude that the proposed 25 ppm temporary tolerance for residues of BAS 352F and its 3,5-dichloroaniline containing metabolites in or on peaches, nectarines and cherries will be adequate to cover residues resulting from the proposed use.

Plums, Fresh Prunes

The petitioner restricted the proposed use to plums and fresh prunes. Residue data reflect 6 studies from CA (4), OR and MI. Following 1-4 applications at the rate of 0.25-1 lb. act/A residues at PHI's of 5 days or longer were all < 0.90 ppm in or on plums or fresh prunes.

Based on the above data we conclude that the proposed 25 ppm temporary tolerance for residues of BAS 352F and its 3,5-dichloroaniline containing metabolites in or on plums and fresh prunes will be adequate to cover residues resulting from this use.

Conclusions

1. The proposed temporary tolerance of 25 ppm for residues of BAS 352F and its 3,5-dichloroaniline containing metabolites in or on cherries, plums, fresh prunes, peaches, apricots and nectarines will be adequate to cover residues resulting from this use.

2. The label change limiting the use to fresh prunes only and restricting grazing or feeding of livestock on cover crops grown in treated orchards, resolves the remaining deficiencies.

Recommendation

TOX considerations permitting we recommend that the proposed temporary tolerances for residues of BAS 352F (vinclozolin) and its 3,5-dichloroaniline containing metabolites in or on cherries, plums, fresh prunes, peaches, nectarines and apricots be established.

RCB:W.L.Anthony:mch:CM#2:RM810:X77377:3/23/83
cc: R.F., Circu., W. L. Anthony, Thompson, FDA, TOX, EEB, EFB, PP# 9G2204
RDI: E. Zager, 3/18/83; R. Schmitt, 3/18/83