3-2-88 RF

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

MAR 2 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP#3F2934. Vinclozolin (Ronilan™) on Raspberries, Leaf Lettuce and Dry Bulb onions. Amendment of 9/22/88 (RCB #3346).

FROM: Gary F. Otakie, Chemist
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Lois A. Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evalaution Division (TS-769C)

The petitioner, BASF Wyondotte Corporation, has submitted an amendment containing a revised Section B which includes a label restriction not to apply more that 6 lbs Ronilan™ per acre in one season on lettuce (both head and leaf), and a revised Section F that has deleted the previously proposed tolerance on green onions and requests the establishment of tolerances for combined residues of the fungicide 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2, 4-oxazolidinedione (vinclozolin) and its metabolites containing the 3,5-dichloroaniline moiety in or on the raw agricultural commodities, leaf lettuce and raspberries, at 10 ppm and dry bulb onions, at 1.0 ppm.

The preceding revised Sections B and F are in accordance with the recommendations outlined in RCB's 12/29/87 review of PP#3F2934.

RCB concludes that all the residue chemistry deficiencies have been resolved.

Recommendations

If TOX and EAB considertions permit, RCB recommends for the establishment of the 10 ppm tolerance on leaf lettuce and raspberries and 1.0 ppm on dry bulb onions for combined residues of vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety.

Other Considerations

(1) An International Residue Limit Status Sheet is attached. Codex has a tolerance for vinclozolin and metabolites containing 3,5-dichloroaniline of 1.0 ppm for bulb onions and 5.0 ppm for red and black raspberries. Thus, a Codex-United States compatibility problem does not exist for bulb onions. However, the proposed United States tolerance of 10.0 ppm on raspberries is not compatible with Codex.

(2) RCB will not recommend that the petitioner be required to carry out FDA multiresidue method Protocols I, II, III, and IV for the proposed uses on leaf lettuce, raspberries and dry bulb onions at this time. However, for any future use or a change in the application use rate for vinclozolin on onions, raspberries, lettuce and crops listed under 40 CFR 180.380, the petitioner will need to subject vinclozolin to these protocols (see FEDERAL REGISTER/Vol. 51, No. 187/FRIDAY, September 26, 1986).

cc: PP#3F2934, Reviewer; G. Otakie, R.F., Circu., PM# 21, TOX, PMSD/ISB
TS-769C:RCB/G. Otakie:MT:CM#2:Rm.810:557-7484:2/29/88
RDI:J. H. Onley:2/25/88:R. D. Schmitt:2/25/88

F. Lowe 2/25/88

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL VINCLOZOLIN

CODEX NO. 159

CODEX STATUS:

☐ No Codex Proposal Step 6 or above

Residue(if Step 8): sum of vinclozolin and all metabolites containing 3,5-dichloroaniline expressed as vinclozolin

Crop(s)	Limit (mg/kg)
onion, bulb	1
lettuce, head	5
raspberries, red, black	5

PROPOSED U.S. TOLERANCES:

Petition No. 3F2934

RCB Reviewer G. OTAMIE

Residue: PARENT PLUS METABOLITE WITH 3,5-DICHLOROANILINE MOIETY

Crop(s)	Limit (mg/kg)
ONIONS, BULB	1.0 PPM
LETTUCE, LEAF	10.0 PPM
RASPBERRIES	10.0 PPM

CANADIAN LIMITS:

☑ No Canadian limit

Residue: _____

Crop(s)	Limit (mg/kg)

MEXICAN LIMITS:

☑ No Mexican limit

Residue: _____

Crop(s)	Limit (mg/kg)

NOTES:

Form revised 1986