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EEE BRANCH REVIEW

DATE: IN 1/7/80 OUT 2/20/80 IN 5/21/79 OUT 3/25/80 IN _____ OUT _____

FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 7969-LG

PETITION OR EXP. PERMIT NO. 9F2205

DATE DIV. RECEIVED 1/7/80

DATE OF SUBMISSION 12/12/79

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCTS(S): I , D, H, (F,) N, R, S _____

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. 21

PRODUCT NAME(S) RONILAN Fungicide

COMPANY NAME BASF Wyandotte Corp.

SUBMISSION PURPOSE Registration - STRAWBERRIES

CHEMICAL & FORMULATION Vinclozolin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: January 15, 1980

SUBJECT: Solubility problem for acute aquatic tests, regarding PP-9F 2205 - RONILAN Fungicide (Vinclozolin)

FROM: Fishery Biologist
Ecological Effects Branch

TO: Henry M. Jacoby, PM 21
Registration Division (TS-767)

THRU: David Coppage, Head Section #3, EEB, HED

THRU: Clayton Bushong, Chief, Ecological Effects Branch, HED

This memo is a response to the comments of BASF Wyandotte Corp. regarding the solubility problem encountered in the 96-hour acute Bluegill and Rainbow trout study.

The conclusions of the registrant do not indicate that Vinclozolin is non-hazardous to fish.

In order to maintain scientific consistency, the Ecological Effects Branch must obtain an accurate indication of toxicity (active ingredient) for the following reasons:

1) Hazard evaluation can not be completed without adequate test data (acute LC50 test).
2) Classification processes require a determination of the 96-hour LC50 prior to registration.
3) RPAR criteria may be exceeded. Consistent scientific data is paramount to objective evaluation.

Prior to registration, the registrant must resubmit the 96-hour Rainbow trout and 96-hour Bluegill sunfish studies. The registrant should be aware of the following procedures for dealing with insoluble materials.

1) Other solvents, beside acetone should be used. A list of all solvents should be submitted to EEB.
2) Chemical analysis during testing in order to establish definite toxicant levels.
3) The registrant may wish to contact Dr. Wesley J. Birge at the University of Kentucky, Lexington. Dr. Birge has developed a flow through system where insoluble compounds are suspended in influent water by mechanical homogenization and maintained by continuous agitation in the exposure chamber.

The registrant should contact the Ecological Effects Branch for assistance concerning test methods and protocols.

Miachel Rexrode

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EPA FORM 1320-6 (REV. 3-76)