

US EPA ARCHIVE DOCUMENT

113201

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ECOLOGICAL EFFECTS BRANCH

REVIEW

DATE: IN 4/28/80 OUT 7/16/80

FILE OR REG. NO. 7969-53

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED _____

DATE OF SUBMISSION _____

DATE SUBMISSION ACCEPTED _____

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

DATA ACCESSION NO(S). 242222

PRODUCT MGR. NO. (21) Jacoby

PRODUCT NAME(S) Ronilan

COMPANY NAME BASF Wyndotte

SUBMISSION PURPOSE Data Review

CHEMICAL & FORMULATION Vinclozolin

Vinclozolin
(RONILAN)

100 Pesticide Label Information

Strawberries - 1-2 lb AI/acre

107 Conclusions

107.4 Data Adequacy Conclusions

Ecological Effects Branch notes that the test was scientifically sound although sedimentation was noted in test levels above 2.15 ppm. However, this is not considered a serious problem, since the registrant has made a reasonable effort to get the test material into solution in this the second test. Even so, this test is presently Unacceptable in meeting the Guidelines minimum data requirement for a warmwater fish 96-hr LC50 but upon receipt of % active ingredient in the test material and clarification of test species (i. e. is it the bluegill - Lepomis macrochirus - or pumpkinseed-Lepomis gibbosus?) can be upgraded for the strawberry registration at 1-2 lb AI/acre and for other registrations that will result in a warmwater aquatic environmental concentration less than 1/100,000th the warmwater fish 96-hr LC50.

107.5 Data Requirements

Other than the two pieces of information necessary to upgrade the warmwater fish 96-hr LC50 mentioned above (Sect. 107.4), no further aquatic data is necessary for the registration of RONILAN on strawberries at 1-2 lb AI/acre.

Further warmwater and coldwater fish acute tests which are successful in keeping vinclozolin in solution or suspension may be deemed necessary to support future registrations that will result in warmwater and coldwater aquatic environmental concentrations more than 1/100,000th the current warm - and coldwater fish 96-hr LC50's.

EEB is still interested in determining with the registrant what test levels for the avian reproduction studies (mallard and bobwhite quail) will be appropriate for both strawberries and future crop registrations (e. g. lettuce, orchards).

107.6 Special Notes

EEB would also like to make note of statements in the second paragraph of the registrant's letter to Mr. Jacoby that accompanied the warmwater fish study. While the registrant was obviously trying to state his options for a data waiver in an open, honest and aboveboard manner,

such statements could be misconstrued as trying to exert undo political pressure on the scientific review of his tests. Scientific integrity demands that reviewers be free of such pressures. Such unfortunate occurrences should be avoided at all costs in the future.

107.7

Recommendations

EEB objects to the registration of RONILAN on strawberries at 1-2 lb AI/acre until receipt of the two pieces of information in Sect. 107.4 and written agreement to the following conditions is received:

- 1) That avian reproduction studies (mallard and bobwhite quail) be done at test levels, yet to be determined, that will be appropriate for both strawberries and future crop registrations (e. g. lettuce, orchards); and
- 2) That if the avian reproduction test indicates significant impairment at certain test levels, then registration on any crop on which similar levels are found or expected will be withdrawn or denied.

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