

US EPA ARCHIVE DOCUMENT

Date Out of EFB: AUG 11 1982

To: Don Stubbs  
Product Manager 41  
Registration Division (TS-767)

From: S. Creeger, Head (acting) *SC*  
Review Section 1  
Environmental Fate Branch  
Hazard Evaluation Division (TS-769c)

Attached please find the EFB review of...

Reg./File No.: 82-AZ-10

Chemical: Vinclozolin

[3-3,5-dichlorophenyl-5-ethenyl-5-methyl-2,4-oxazolidine-2,4-dione]

Type Product: Fungicide

Product Name: Ronilan

Company Name: BASF

Submission Purpose: Modification of Section 18, to include use on  
Greenhouse Lettuce.

ZBB Code: Sec 18

ACTION CODE: 510

Date In: 8/9/82

EFB # 426

Date Completed: 8/11/82

TAIS (level II)

Days

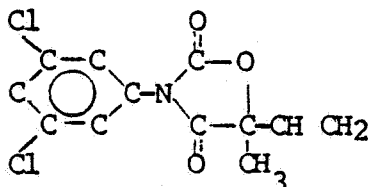
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## 1.0 INTRODUCTION

The Arizona Commission of Agriculture and Horticulture requests a modification of their existing Section 18 use of Vinclozolin [3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidine-2,4-dione, RONILAN 50% W/P] on field lettuce to include use on greenhouse lettuce. The current Section 18 exemption expired on 5/1/82.

## 2.0 STRUCTURE



## 3.0 DIRECTIONS FOR USE

The directions for use which were included with this submission were not sufficiently detailed to give a clear understanding of the proposed use pattern.

## 4.0 DISCUSSION

RONILAN is manufactured by BASF, and is currently registered for use only on Strawberries (Reg # 7969-53). The directions for use under the previous Section 18 were as follows:

Use Sites: Maricopa, Pinal, Pima, Cochise and Yuma Counties in Arizona.

Application Rate: 0.25 to 1.0 lb ai/acre

# of Applications: Maximum of 3x at 14-day intervals, to include a 14-day pre-harvest interval.

Additional conditions may be found in the telex, a copy of which is appended to this review.

## 5.0 CONCLUSIONS

EFB cannot concur with the proposed Section 18 at the present time for the following reasons:

The amount of active ingredient to be used as well as the specific conditions and limitations of use have not been specified.

Additionally, EFB would appreciate a copy of the requisite report summarizing the first year's program.

6.0 RECOMMENDATIONS

The Arizona Commission of Agriculture and Horticulture should provide detailed information about the proposed use. Such information should include, as a minimum...

- a. Concentration of ai/gallon.
- b. Total amount of ai to be used in the program.
- c. Sites of usage.
- d. Time from application to reentry.
- e. Total acreage to be treated.
- f. Maximal number of applications per season.
- g. Post-harvest interval to be imposed, if any.
- h. Plan for disposal of unused RONILAN and/or application solutions.
- i. Number and kinds of workers possibly exposed to the fungicide.
- j. Official responsible for compliance.



E. Regelman  
Chemist  
EFB/HED (TS-769c)  
August 11, 1982

**TELEGRAPHIC MESSAGE**

NAME OF AGENCY  EPA - Washington, DC 20460	PRECEDENCE  ACTION:  INFO:	SECURITY CLASSIFICATION  UNCLAS
ACCOUNTING CLASSIFICATION	DATE PREPARED	TYPE OF MESSAGE
FOR INFORMATION CALL		<input type="checkbox"/> SINGLE
NAME Donald R. Stubbs, Section Head	PHONE NUMBER (703) 557-7123	<input type="checkbox"/> BOOK <input type="checkbox"/> MULTIPLE-ADDRESS

THIS SPACE FOR USE OF COMMUNICATION UNIT

TELEFAX: Nancy Frost, Pesticide Branch - EPA Region IX

MESSAGE TO BE TRANSMITTED (Use double spacing and all capital letters)

TO:

AZ COMM. OF AGRICULTURE &  
 HORTICULTURE, 1688 WEST ADAMS  
 PHOENIX, ARIZONA 85007

ATT'N: MR. JAMES R. CARTER

THE ENVIRONMENTAL PROTECTION AGENCY HEREBY GRANTS A SPECIFIC EXEMPTION UNDER THE PROVISIONS OF SECTION 18 OF THE FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT, AS AMENDED, TO THE ARIZONA COMMISSION OF AGRICULTURE & HORTICULTURE FOR THE USE OF VINCLOZOLIN, MANUFACTURED BY BASF WYANDOTTE CORPORATION AS RONILAN 50W, TO CONTROL SCLEROTINIA SPP. ON LETTUCE GROWN IN MARICOPA, PINAL, PIMA, COCHISE AND YUMA COUNTIES. THIS SPECIFIC EXEMPTION IS SUBJECT TO THE FOLLOWING RESTRICTIONS:

1. THE ARIZONA COMMISSION OF AGRICULTURE AND HORTICULTURE IS RESPONSIBLE FOR ENSURING THAT ALL PROVISIONS OF THIS SPECIFIC EXEMPTION ARE MET. IT IS ALSO RESPONSIBLE FOR PROVIDING INFORMATION IN ACCORDANCE WITH 40 CFR 166.5. THIS INFORMATION MUST BE SUBMITTED TO EPA HEADQUARTERS THROUGH THE EPA REGIONAL OFFICE.

SECURITY CLASSIFICATION	
PAGE NO. 1	NO. OF PGS. 3

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FOR INFORMATION CALL		
NAME  Donald R. Stubbs, Section Head	PHONE NUMBER  (703) 557-7123	

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**TELEFAX: Nancy Frost, Pesticide Branch - EPA Region IX**

MESSAGE TO BE TRANSMITTED (Use double spacing and all capital letters)

**TO:**

2. THE PRODUCT, RONILAN, (EPA REG. NO. 7969-53), WILL BE APPLIED BY GROUND AT A RATE OF 0.25 TO 1.0 POUNDS ACTIVE INGREDIENT PER ACRE.
3. A TOTAL OF 3 APPLICATIONS AT FOURTEEN (14) DAY INTERVALS WITH A 14-DAY PRE-HARVEST INTERVAL IS AUTHORIZED.
4. A MAXIMUM OF 20,000 ACRES OF LETTUCE MAY BE TREATED.
5. ALL APPLICABLE REGISTERED LABEL USE DIRECTIONS, PRECAUTIONS, AND RESTRICTIONS MUST BE FOLLOWED.
6. LETTUCE TREATED ACCORDING TO THE ABOVE PROVISIONS WILL NOT HAVE RESIDUES OF VINCLOZOLIN AND ITS DICHLOROANILINE-CONTAINING METABOLITES IN EXCESS OF 10 PPM. THE FOOD AND DRUG ADMINISTRATION, DHHS, HAS BEEN ADVISED OF THIS ACTION.
7. THE EPA MUST BE IMMEDIATELY INFORMED OF ANY ADVERSE EFFECTS RESULTING FROM THE USE OF VINCLOZOLIN IN CONNECTION WITH THIS EXEMPTION.
8. A REPORT SUMMARIZING THE RESULTS OF THIS PROGRAM MUST BE SUBMITTED BY NOVEMBER 1, 1982.

SECURITY CLASSIFICATION

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**TELEGRAPHIC MESSAGE**

NAME OF AGENCY  EPA - Washington, DC 20460		PRECEDENCE  ACTION:  INFO:	SECURITY CLASSIFICATION  <b>UNCLAS</b>
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TELEFAX: Nancy Frost, Pesticide Branch - EPA Region IX

MESSAGE TO BE TRANSMITTED (Use double spacing and all capital letters)

TO:

9. THIS SPECIFIC EXEMPTION EXPIRES ON MAY 1, 1982.



EDWIN L. JOHNSON  
DIRECTOR  
OFFICE OF PESTICIDE PROGRAMS (TS-766C)

DATE:

10/21/81

SECURITY CLASSIFICATION

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