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

OCT 28 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: 83-CA-04. Proposed Section 18 exemption for the use of Ronilan (vinclozolin) on grapes in California.

From: Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Dvision (TS-769)

Edward Zager

Thru: Charles L. Trichilo, Chief
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To: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The State of California Department of Food and Agriculture issued a crisis exemption under 40 CFR 166.8 for the use of vinclozolin (3-(3,5-dichlorophenyl-5-ethenyl-5-methyl-2,4-oxazolidinedione) to control bunch rot on wine grapes in California. They now request a specific exemption for this use.

PP# 1E2457 proposing a tolerance of 6 ppm for residues of 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione and its metabolites containing the 3,5-dichloroaniline moiety in or on Table grapes is currently in reject status due to chemistry questions relating to the use of grapes and its by-products as feed items.

The proposed use calls for a single ground application to wine grapes at the rate of 0.75 lb. act/A in 200 gallons of water per acre with a 1 day PHI. There is a restriction against feeding of treated grape pomace to livestock. Applications will be made statewide. According to the California Department of Food and Agriculture the restriction against using treated grape pomace for feed is practical because of the ready availability of alternate feeds (J. Housenger, Telecon, 10/26/82). The treated pomace will be returned to the vineyards and spread on the soil.

The metabolism of Ronilan in plants was discussed in our review of PP# 1E2457 (John H. Onley 4/27/81). The residue of concern in grapes is the parent compound plus the metabolites containing the 3,5-dichloroaniline moiety.

Residue data submitted in connection with PP# 1E2457 reflect studies conducted in Canada, France, Germany, England, Italy, Spain and South Africa.

Following 2-5 appplications at the rate of 0.67-1.12 lbs. act/A residues ranged from 1.2-11.4 ppm in or on grapes on the day of the last application.

Based on the above data we estimate that residues of vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety will not exceed 10 ppm in or on grapes as a result of the proposed use.

Meat, Milk, Poultry and Eggs

The possible feed item, grape pomace will not be used for livestock feed but will be returned to the vineyards and spread on the soil.

Consequently, there will be no feed items involved in this use and no problem with secondary residues in meat, milk, poultry and eggs.

Conclusions

1. Residues of vinvlozolin and its metabolites containing the 3,5-dichloroaniline moiety will not exceed 10 ppm in or on grapes as a result of this use.

2. The proposed use will not lead to secondary residues in meat, milk, poultry and eggs.

Recommendation

TOX considerations permitting we have no objections to the granting of this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated commodities in commerce.

TS-769:RCB:E.Zager:mch:CM#2:RM810:X77324:10/27/82
cc: Section 18 S.F., R.F., Circu., E. Zager, Ronilan S.F.
RDI: A. Rathman, 10/27/82; R. Schmitt, 10/27/82