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

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 83-NC-02. Proposed Section 18 exemption for the use of vinclozolin on peanuts in North Carolina.

FROM: Edward Zager, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO: Emergency Response Section  
Registration Division (TS-767)

and  
Toxicology Branch  
Hazard Evaluation Division (TS-769)

The State of North Carolina requests a Section 18 exemption for the use of Ronilan 50W (vinclozolin) on peanuts.

The proposed use would permit up to two applications at the rate of 0.75 lbs act/A in 30 gallons of water/A. The PHI is not specified.

There are no residue data available reflecting the proposed use.

PP#1E2457 proposing a tolerance for residues of vinclozolin (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 inter alia: the lack of metabolism/feeding studies for large ruminants and poultry and the lack of methodology and validation data for vinclozolin and its metabolites in animal commodities (meat, milk, poultry and eggs) (J. Onley, 10/20/81).

Since peanuts, peanut meal, hulls, vines and hay are also animal feed items the above deficiencies would preclude the issuance of this Section 18 exemption.

Conclusions

1. In the absence of residue data reflecting the proposed use we are unable to estimate residue levels of vinclozolin and its metabolites in peanuts and peanut hulls, vines and hay.
2. In the absence of a peanut processing study, we are unable to estimate levels of residue that could result in peanut oil, meal and soapstock from this use.
3. There no analytical methods available for secondary residues of vinclozolin in meat, milk, poultry and eggs.
4. Due to the absence of residue data for animal feed items and the lack of metabolism/feeding studies, we are unable to estimate secondary residues that could result in meat, milk, poultry and eggs from this use.

Recommendation

For the reasons listed in Conclusions 1,2,3 and 4 we recommend against the granting of this Section 18 exemption.

For a further consideration of this request we will require.

1. Residue data reflecting the proposed use for peanuts, and peanut hulls, vines and hay.
2. A peanut processing study.
3. Metabolism/feeding studies for large ruminants and poultry.
4. Methodology and validation data for vinclozolin and its metabolites in meat, milk, poultry and eggs.

cc: Vinclozolin S.F.

R.F.

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E. Zager

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Section 18 S.F. Vinclozolin

RDI:Section Head:RJH:Date:2/2/9/83:RDS:Date:2/9/83

TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM#2:RM:810:Date:2/10/83