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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

APR 13 1983

MEMORANDUM

SUBJECT: PP#1E2457. BAS 352F (Ronilan) in or on Grapes.
Amendment of February 1, 1983. This date is from
the "EPA Date Received" on Registration Division
Data Review Record.

FROM: John H. Onley, Ph.D., Chemist 
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Henry Jacoby, Product Manager No. 21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The petitioner, BASF Wyandotte Corporation, has submitted
this amendment in response to our October 20, 1981 review of
amendment July 31, 1981.

The petitioner has submitted the following letters (the
only content of this amendment) in support of his argument
that grapes imported from Chile will be used only on the
fresh market:

1. Alberto L. Bambach (Frupac International Corporation
June 2, 1982)
2. Blue Anchor, Inc. (June 4, 1982)
3. Jack V. Pandol (Pandol Bros. Inc. - April 21, 1982).

4. Peter Kopke (William H. Kopke, Jr. Inc. - July 12, 1982).
5. Irving Gates (Hillcrest Sales, Inc. - June 15, 1982).

Our Comments/Conclusions on the Petitioner's Submission (the above 5 letters).

At present, vinclozolin (Ronilan) tolerances have been established on kiwi fruit, strawberries, and head lettuce (40 CFR 180.380). The establishment of any new vinclozolin tolerances on crops that can be utilized as feed items should have appropriate cattle and poultry feeding and metabolism studies to determine if secondary residues will occur in meat, milk, poultry and eggs. While the letters of support indicating grapes imported from Chile are only sold for human consumption have merit, no consideration has been given as to the disposition of spoiled grapes or surplus grapes that have been imported. We have been informed by one source that grapes are highly perishable and there is no assurance that spoiled table grapes in bulk will not be used as a feed item (Telephone conversation between Mr. Robert Keeney, United Fresh Fruits and Vegetables Association and Dr. J. Onley, EPA - October 6, 1981). We have been informed by another source that there is no assurance that imported table grapes will be used solely for that purpose (Telephone conversation between Bernadine Baker - U.S. Dept. of Agriculture and J. Onley, EPA - March 30, 1981). In view, of the preceding, we can not concur that grapes imported from Chile will be used exclusively for the fresh market.

For the establishment of a vinclozolin (Ronilan) tolerance on grapes, we reiterate the deficiencies that need to be resolved as stated in our October 20, 1981 review of amendment July 31, 1981:

Deficiency No. 1:

For the proposed use, the nature of the residue in animals is not adequately understood. The petitioner needs to submit a large animal (lactating ruminant) and poultry metabolism studies.

Deficiency No. 2:

Methodology and validation data for BAS 352F and its metabolites in grape fractions (wet and dry pomaces, etc.) will also be needed.

Deficiency No. 3:

Methodology and validation data for BAS 352F and its metabolites in animal commodities (meat, milk, poultry and eggs) will be needed.

Deficiency No. 4:

We find the proposed tolerance on table grapes to be impractical. There is no assurance that imported table grapes will be used solely for that purpose (Telephone conversation between Bernadine Baker, U.S. Dept. of Agriculture and J. Onley, EPA-March 30, 1981.) The petitioner needs to provide a revised Section F wherein the tolerance is proposed on grapes.

Deficiency No. 5:

The petitioner needs to submit a grape fractionation study. Residue data on juice, wet and dry pomaces should be submitted. If any of these fractions should show BAS 352F concentrations greater than the maximum residue value for grapes then appropriate food additive tolerances should be proposed.

Deficiency No. 6:

For the proposed use, several feed items may be involved. Therefore, the petitioner needs to submit a large animal (lactating ruminant) and poultry feeding studies. Without these data, we cannot predict whether there will be any problems with secondary residues in meat, milk, poultry and eggs. Note: No tolerances have been established for animal commodities.

Other comments. An International Tolerance Status Sheet has been attached to this review. Codex, Canada, and Mexico have not established any vinclozolin (Ronilan) tolerances on grapes or any of its fractions.

Attachment

cc: R.F.
Circu
RDI: Quick
AS
FDA
TOX
EEB
EAD
PP# No.

Robert E. Thompson, Quick

RDI:Section Head:RSO>Date:4/5/83 :RDS>Date-4/5/83
TS-769:RCB-18:jo:efs:Rm-810:CM#2:X77324>Date-4/12/83
DCR-17216:RCB-18:JohnOnley:810:557-7371:4/6/83:efs
REVISED-4/12/83:DCR-17246:jo:efs:RCB-18

INTERNATIONAL RESIDUE LIMIT STATUS

Update of 3/26/81
current as of
4/1/83 J.D.

CHEMICAL Ronilan

PETITION NO. 1E2457 (J. Onley)

CCPR NO. ---

Codex Status

Proposed U.S. Tolerances

No Codex Proposal Step
6 or above

Residue (if Step 9): None

Residue: 3-(3,5-dichlorophenyl)-
5-ethenyl-5-methyl-2,4-oxazolidine-
dione (Ronilan)

Crop(s) Limit (mg/kg)

Crop(s) Tol. (ppm)

None

Grapes

6

CANADIAN LIMIT

MEXICAN TOLERANCIA

Residue: _____

Residue: None

Crop Limit (ppm)

Crop Tolerancia (ppm)

None

None

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Notes:

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