

US EPA ARCHIVE DOCUMENT



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

4-27-89  
R.F.

APR 27 1989

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#8E3688: Request of Tolerances for Vinclozolin (Ronilan®) in/on Greenhouse-grown Cucumbers and Tomatoes Imported from Spain and The Netherlands. Amendment of 3/30/89 (No MRID number; DEB #5186).

FROM: W. T. Chin, Chemist, Ph.D. *W. T. Chin*  
Tolerance Petition Section III  
Dietary Exposure Branch  
Health Effect Division (H7509C)

THRU: Philip V. Errico, Section Head *Philip V. Errico*  
Tolerance Petition Section III  
Dietary Exposure Branch  
Health Effect Division (H7509C)

TO: Lois A. Rossi, PM #21  
Herbicide-Fungicide Branch  
Registration Division (H7505C)

and

Toxicology Branch  
Health Effect Division (H7509C)

BACKGROUND

In response to DEB's (W. T. Chin) 3/9/89 memo, the petitioner, BASF Corporation, submitted a letter dated 3/30/89 with a revised Section F in connection with the request of tolerances for the combined residues of the fungicide vinclozolin, 3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione, and its metabolites containing the 3,5-dichloroaniline moiety in or on the greenhouse-grown raw agricultural commodities cucumbers and tomatoes at 1 and 3 ppm, respectively, imported from Spain and The Netherlands. DEB's 3/9/89 RECOMMENDATIONS and the petitioner's responses are restated below, followed by DEB's comment/Conclusion.

DEB's 3/9/89 Recommendations

"With a memo from the petitioner stating that greenhouse-grown tomatoes in Spain and The Netherlands are not diverted to processing use, a revised Section F raising the requested tolerance on tomatoes to 3 ppm and deleting the requests for food and feed additive tolerances, and TOX considerations permitting, DEB can recommend for the requested tolerances for the combined residues of the fungicide vinclozolin and its metabolites in or on the greenhouse-grown cucumbers and tomatoes at 1 and 3 ppm, respectively, imported from Spain and The Netherlands only."

The Petitioner's Responses to DEB's Recommendations

The petitioner's 3/30/89 letter indicates: ".... our European colleagues assure us that greenhouse-grown tomatoes in Spain and in The Netherlands are not diverted to processing use. This would negate the need for a food or feed additive tolerance; we hereby withdraw the request for same from our previous submission."

In the revised Section F, the proposed tolerance for vinclozolin and its metabolites in or on the greenhouse-grown tomatoes imported from Spain and The Netherlands is raised from 2 ppm to 3 ppm.

DEB's Comment/Conclusion on the Petitioner's Responses

Since the petitioner's responses have adequately satisfied the requests identified in the Recommendation section of DEB's 3/9/89 memo, therefore, DEB concludes that the establishment of the combined residues of the fungicide vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety in or on the greenhouse-grown cucumbers and tomatoes at 1 and 3 ppm, respectively, imported from Spain and The Netherlands are appropriate.

Other Considerations

There are no Mexican and Canadian tolerances established for vinclozolin in tomatoes and cucumbers. Codex's 1 ppm limit for cucumbers is in harmony with this requested tolerance. Codex is presently considering a 3 ppm tolerance on tomatoes at level 7. Since the petitioner has raised the proposed tolerance for tomatoes from 2 ppm to 3 ppm, DEB, therefore, can harmonize with Codex.

Recommendation

TOX considerations permitting, DEB recommends for the establishment of the combined residues of the fungicide vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety in or on the greenhouse-grown raw agricultural commodities cucumbers and tomatoes at 1 and 3 ppm, respectively, imported from Spain and The Netherlands.

A NOTE TO PM

When these proposed tolerances are established, DEB recommends that they be listed under 40 CFR 180.380(c) for imported tolerances.

Attachment: Codex Sheet.

cc: Circu., RF, W.T.Chin, R.D.Schmitt, PMDS/ISB, PP#8E3688, F.Ives(SACB/HED) and  
TAS(Timerlin)

RDI: P.V.Errico(4/26/89):R.Loranger(4/26/89)  
H7509C: DEB: CM2: RM812:557-4352: W.T.Chin,wc(4/27/89)

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Vinclozolin (Ronilan®)

*L. Voss*  
*4/24/89*

CODEX NO. 159

CODEX STATUS:

No Codex Proposal  
Step 6 or above

PROPOSED U.S. TOLERANCES:

Petition No. PP# 8E3688

RCB Reviewer W. T. Chin

Residue: Ronilan® (Vinclozolin) and  
metabolites containing 3,5-dichloroaniline

Residue (if Step 8): Sum of Vinclozolin  
and all metabolites  
containing the 3,5-dichloroaniline moiety, expressed  
as vinclozolin

<u>Crop(s)</u>	<u>Limit (mg/kg)</u>
<u>Tomato</u>	<u>3</u>
<u>cucumber</u>	<u>1</u>

<u>Crop(s)</u>	<u>Limit (mg/kg)</u>
<u>Tomatoes (greenhouse)</u>	<u>3.0</u>
<u>Cucumbers (grown)</u>	<u>1.0</u>

CANADIAN LIMITS:

No Canadian limit

Residue: \_\_\_\_\_  
\_\_\_\_\_

MEXICAN LIMITS:

No Mexican limit

Residue: \_\_\_\_\_  
\_\_\_\_\_

<u>Crop(s)</u>	<u>Limit (mg/kg)</u>
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<u>Crop(s)</u>	<u>Limit (mg/kg)</u>
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NOTES: