Shaughnessy No: 109801

Date Out of EAB: JUL 01 1985

To: Henry Jacoby
Product Manager 21
Registration Division (TS-767)

From: Samuel M. Creeger, Chief
Environmental Chemistry Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division TS-769c

COPY

Attached, please find the EAB review of:

Reg./File # : 359-685

Chemical Name: Irodione

Type Product : Fungicide

Product Name : ROVRAL

Company Name : Rhone-Poulenc

Purpose : Evaluate crayfish bioconcentration study.

Action Code : 352

EAB #(s) : 5574

Date Received : 4/29/85

TAIS Code: 51

Date Completed: 6/27/85

Reviewing Time: 0.5 day

Deferrals to:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

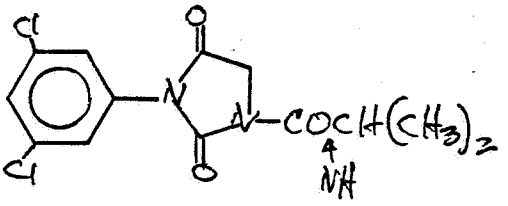
1. CHEMICAL:

Common Name- Iprodione

Chemical Name- 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide

Trade Name- ROVRAL Fungicide (50% ai)

Chemical Structure-



2. TEST MATERIAL: This submission is a protocol review and Rhone-Poulenc will be supplying the test substance (ai) to the contracting lab, Analytical Bio-Chemistry Laboratories (ABC).

3. STUDY/ACTION TYPE: Rhone-Poulenc is requesting review of a crayfish bioconcentration protocol to support the registration of ROVRAL for use on rice.

4. STUDY IDENTIFICATION: Procedure for static crayfish bioconcentration studies with ^{14}C-labedled test materials and soil substrate, ABC Protocol No. 7909, (rivised Feb 17, 1984).

5. REVIEWED BY:

Herbert L. Manning, Ph.D.
Microbiologist
EAB/HED

Signature: Herbert L. Manning
Date: June 27, 1985

6. APPROVED BY:

Samuel M. Creeger
Chief, Section 1
EAB/HED

Signature: Samuel M. Creeger
Date: JUL 01 1985

7. CONCLUSIONS:

In general, the submitted protocol follows our guidelines very closely and would satisfy most of the requirements of the study. However, certain information is lacking or the item is not directly addressed. See RECOMMENDATIONS for specifics.

8. RECOMMENDATIONS:

Most of the required information in the protocol is acceptable, but certain aspects of the study should be addressed. With regard to the protocol, please note that in the absence of a complete description of the analytical methods, no comments can be offered on their adequacy. Also, if water or soil samples containing the pesticide are to be stored before analysis, then storage stability data may be needed.

- o Section 2.0- Exposure to pesticide should be for 28 days and depuration for 14 days. Therefore, additional exposure samples at 21 and 28 days and an additional depuration sample at 14 days are needed.
- o Section 4.5- Without specifying the site of radiolabeling, we cannot comment on the appropriateness of the test material (ai).

  The test material should be stated to be the active ingredient. Use the maximum application rate as stated on the label.
- o Section 4.9- The residues must be identified, not just characterized.

9. BACKGROUND:

A. Introduction

See Section 3 of this review.

B. Directions for Use

Not applicable.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

A. Study/Protocol Identification

See Section 4 of this review.

B. Reviewer's Comments

See RECOMMENDATIONS.

11. COMPLETION OF ONE-LINER:

Not applicable. No new data were submitted.

12. CONFIDENTIAL APPENDIX:

There was no CBI in this submission.