5-14-92 RT.

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

MAY 14 1992

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: 24(C) Use of Iprodione on Dry Bulb Onions in Arizona.

Chemistry Branch No.: 9834
Chemical No. : 109801
DP Barcode: D177633
MRID : None

From: R. W. Cook, Chemist RW Cook
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Background:

Tolerances are established under 40 CFR 180.399(a) for combined residues of iprodione, its isomer 3-(1-methylethyl)-N-(3,5 dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide, and its metabolite 3-(3,5 dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide in or on dry bulb onions at 0.5 ppm. Such tolerances were established at the request of Rhone-Poulenc Inc. in PP4F3111.

No previous Section 24(c) requests for iprodione on dry bulb onions have been reviewed by CBTS. Section 18 requests for iprodione on dry bulb onions have been reviewed under 84-WA-12 (W. Anthony, 8/9/84) and in 82-NJ-18 (E. Zager, 5/6/82).

The performing laboratory for the residue data discussed in PP4F3111 is Rhone-Poulenc, Inc.

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Under the Section 24(c) request, dry bulb onions grown in Arizona could be harvested at a 0 day preharvest interval for transplantation purposes.

Proposed use:

To control Botrytis leaf blight on dry bulb onions for transplant only, apply 1.5 pounds of Rovral (EPA REG. No. 264-453, 50% Wettable Powder) per acre (equivalent to 0.75 pounds a.i. per acre) as a foliar spray in 50 to 100 gallons of spray per acre by ground equipment. Up to 10 applications can be made per season at 7 to 14 day intervals. When the crop is to be transplanted to another site for further growth, harvest for movement to the second site may begin when the spray has dried.

Nature of the Residue:

The nature of the residue is adequately understood. for the purposes of the section 24(c) herein, the residue of concern is iprodione, its isomer 3-(1-methylethyl)-N-(3,5 dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide, and its metabolite 3-(3,5 dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide

Residue Data:

No residue data are submitted in support of the current action.

Residue data for dry bulb onions were submitted in PP4F3111. Combined residues in dry bulb onions grown from seed were less than 0.5 ppm from 8 - 10 applications of 0.75 a.i./A. with preharvest intervals ranging from 0 to 21 days. There are no residue data for dry bulb onions grown from sets.

We conclude that combined residues of iprodione, its isomer and its metabolite are not likely to exceed the established tolerance of 0.5 ppm when used as directed in this Section 24(c) registration request.

Analytical Method:

The analytical method used for the residue data is Rhone-Poulenc Method 151, which determines parent compound, its isomer and its metabolite. Additionally, Method I in PAM II will analyze iprodione, its isomer and its metabolite. We conclude adequate analytical methods are available for enforcement of the proposed section 24(c) registration request.

Analytical reference standards for iprodione are available from the Pesticides and Industrial Chemicals Repository, RTP, NC.

Meat, Milk, Poultry and Eggs:

There are no feed items associated with the production of dry bulb onions. Therefore, no secondary residues are expected in meat, milk, poultry and eggs as a result of this use.

Conclusions:

1. Nature of the residue is adequately understood. The residue of concern is the parent compound, iprodione, its isomer 3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide, and its metabolite 3-(3,5 dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide.

2. Analytical methods are available in PAM II, as Method I and in PP4F3111.

3. Residues of iprodione and its isomer and metabolite are not expected to exceed the established tolerance of 0.5 ppm, when used as proposed in the current Section 24(c) registration request.

4. There are no feed items associated with the production of dry bulb onions. Therefore, no secondary residues are expected in meat, milk, poultry and eggs as a result of this use.

5. Analytical reference standards for iprodione are available from the Pesticides and Industrial Chemicals Repository, RTP, NC.

6. The residue data supporting the established tolerance are not generated by Craven Labs.

Recommendation:

We recommend for the proposed Section 24(c) request.

cc: RF, Circ. Section 24(c) F, C. Furlow (FOD/PIB), R. Cook, D. Edwards.
RDI:RSQ:05/13/92:RAL:05/13/92
H7509C:CBTS:TPSI:rwcook:Rm810H