PERFETT

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL 3-(3,5-Dichlorophenyl)-N-(1-methyl ethyl)2,4-Dioxo-1-imidazolidine carboxamide PETITION NO 2F2596

CCPR NO. (iprodione)

Codex Status

/ / No Codex Proposal
Step 6 or above

Residue (if Step 9): _____

IPRODIONE (metabolites are excluded)

Crop(s)	Limit (mg/kg)
peaches	10
plums	10

CANADIAN LIMIT

Residue: _____

Crop	Limit (ppm)
none	

Proposed U. S. Tolerances

iprodione, 3-(1-methyl ethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidine carboxamide and 3-(3,5-dichlorophenyl)-2,4-dioxo-1

Residue: imidazolidine carboxamid

Crop(s)	Tol. (ppm)
apricots	10 ppm
sweetcherries	
sour cherries	
nectarines	
peaches	
plums	
fresh prunes	

MEXICAN TOLERANCIA

Residue: _____

Crop	Tolerancia (ppm)
none	

Notes:

6-22-82

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

JUN 22 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2F2596 Iprodione on stone fruits. Amendment received in EPA 6/8/82.

From: R. B. Perfetti, 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: H. Jacoby
FHB, Product Manager No. 21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

This amendment is in response to our memo of 5/13/82 in which several deficiencies in the subject petition were outlined. These deficiencies and the petitioner's response to them are discussed below.

Deficiencies:

1) The label should be revised to include a limit on the number of applications of iprodione permitted per year as well as prescribe a minimum interval between applications in the 5 weeks prior to harvest. See the conclusion regarding tolerance levels for peaches and cherries below for a further discussion of these label revisions. The restriction prohibiting feeding treated cover crops to livestock should be modified to read as follows: "Do not feed cover crops grown in treated orchards to livestock". These label modifications should be submitted in a revised Section B.

1/4

4a) The 10 ppm proposed tolerance for cherries is not adequate. If the number of treatments of iprodione permitted per year is held to 6, combined residues of this compound in or on cherries would not be expected to exceed 20 ppm. This higher tolerance level along with the label restriction should be proposed and submitted in revised Sections F and B respectively.

4b) The proposed 10 ppm tolerance level for peaches is not adequate. A more appropriate level would be 20 ppm provided the label is revised to allow a maximum of 5 applications of iprodione to peaches per year. This tolerance level would also be acceptable for nectarines again provided a maximum of 5 applications are allowed per year to this crop. This label restriction along with new tolerance proposals for these commodities should be submitted in revised Sections B and F respectively.

4c) Additional residue data for apricots, plums and prunes will be needed before a determination of appropriate tolerance levels for these commodities can be made. Since California is the major growing area for these fruits residue data from this state only will be required. When the residue data is obtained for prunes, residue bearing samples of this commodity should be dried in order to determine whether residues of iprodione and metabolites concentrate upon processing. If concentration of residues occurs in this fruit, an appropppriate food-additive tolerance propsal based on the maximum concentration factors observed should also be submitted in a revised Section F.

4d) The samples of apricots, nectarines, plums and prunes obtained in the additional residue studies required above should not be held in frozen storage for long periods of time before analysis or a complete 2 year storage stability study may be required.

Response to Deficiencies 1, 4a, 1b and 4c:

The petitioner has submitted revised Sections B and F proposing both the label restrictions required above as well as the recommended 20 ppm tolerance lelvel for cherries, peaches and nectarines. Tolerance proposals for apricots, plums and prunes have been deleted and we assume they have been withdrawn.

Recommendation

TOX and EFB considerations permitting we recommend that the proposed 20 ppm tolerances for combined residues of iprodione and its metabolites in or on cherries (sweet and sour), peaches and nectarines be established.

The petitioner should be reminded of our possible future requirements for establishment of tolerances in apricots, plums and prunes discussed in 4c and 4d above.

Note to PAM Editor: Please see our recommendation regarding methodology discussed in the Analytical Methods Section of our original memo of 5/13/82

Iprodione is now the ANSI approved common name for this chemical.

Finally, the International Tolerance sheet is attached. There are Codex tolerances of 10 ppm on peaches and plums. These tolerances regulate the parent iprodione only. No pathway for making the present recommended 20 ppm tolerance for combined residues of iprodione, its isomer and the des-isopropyl metabolite in or on peaches compatible with the Codex tolerance as expressed can be envisioned.

TS-769:RCB:RPerfetti:vg:CM#2:Rm810:X77377:6/21/82
cc: RF, Circ., Perfetti, Thompson, FDA, TOX, EEF, EFB, PP#2F2596
RDI: Quick, 6/14/82; Schmitt, 6/15/82

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Codex Status

[ ] No Codex Proposal Step 6 or above

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plums	10

CANADIAN LIMIT

Residue: _____

Crop	Limit (ppm)
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Proposed U. S. Tolerances

iprodione, 3-(1-methyl ethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide and 3-(3,5-dichloro phenyl)-2,4-dioxo-1

Residue: imidazolidine carboxamid

Crop(s)	Tol. (ppm)
peaches	20
nectarines	20
sweet cherries	20
sour cherries	20

MEXICAN TOLERANCIA

Residue: _____

Crop	Tolerancia (ppm)
none	

Notes: