



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

APR 25 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 264-EUP-TI; Request for Aerial Application of Iprodione (Rovral 4 Flowable) on Potatoes, Beans, and Dry Bulb Onions.
(No MRID #, DEB # 4994).

From: Freshteh Toghrol Ph.D., Chemist
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F. Toghrol

THRU: Francis B. Suhre, Acting Section Head
Special Registration Section II
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To: Dennis Edwards, PM-41
Insecticide-Rodenticide Branch
Registration Division (H7505C)

and
Toxicology Branch
Health Effect Division (H7509C)

Rhone-Poulenc AG Company has submitted an Experimental Use Permit (264-EUP-TI) to test aerial application of Rovral 4 Flowable on beans, potatoes and dry bulb onions. Rhone-Poulenc maintains that Iprodione residues resulting from this proposed EUP will not exceed established tolerances (base on ground application) in or on beans, potatoes, and dry bulb onions.

Permanent tolerances are established for combined residues of Iprodione [3-(3,5-dichlorophenyl)-N-(methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide], and 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: Bean vines (dried hay) at 90.0 ppm, beans (dry) at 2.0 ppm, bean forage at 90.0 ppm, beans (succulent) at 2.0 ppm, and onion (dry bulb) at 0.5 ppm.

A temporary tolerance for iprodione/metabolites on potatoes at 0.5 ppm will expire on 6/8/89.

Experimental Program:

Beans: 264-EUP-TI (as amended) calls for conducting residue field trials on beans (dry, lima, and snap) in NY, WI, CA, MN, ND, and OR. 60 acres (total) will be treated (2 times) with Rovral 4 Flowable at 2.0 pts/A (1.0 lb ai) in a minimum of 5 gallons of water utilizing fixed wing aircraft or helicopters. The maximum seasonal treatment per acre will be 2.0 lbs. ai. Treatment of beans will be initiated at first bloom and repeated 7 days later. Label restrictions include: Do not allow foraging for 14 days after last treatment; Do not feed snap bean hay and succulent bean hay to livestock; and do not feed dry bean hay to livestock for 45 days after last application;

Dry bulb onions: 264-EUP-TI (as amended) calls for conducting residue field trials on dry bulb onions in CA, CO, ID, MI, NM, NY, OR, TX and WA. 84 acres (total) will be treated (up to 5 times) with Rovral 4 Flowable at 1.5 pts/A (0.75 lb ai) in 5 gallons of water utilizing fixed wing aircraft or helicopters. The maximum seasonal treatment per acre will be 3.75 lbs. ai. Treatment will be initiated as soon as conditions become favorable for disease development, and repeated at 14 or 21 day intervals. A 7 day PHI will be imposed.

Potatoes: 264-EUP-TI (as amended) calls for conducting residue field trials on potatoes in CA, ME, MI, MN, WI, and CO. 72 acres (total) will be treated (2 or 4 times) with Rovral 4 Flowable at 2.0 pts/A (1.0 lb ai) in a minimum of 5 gallons of water utilizing fixed wing aircraft or helicopters. The maximum seasonal treatment per acre will be 4.0 lbs. ai. A 14 days PHI will be imposed. For white mold, begin treatment at the first sign of disease development or immediately prior to row closing and, if conditions are favorable for disease development, repeat the treatment 14 to 28 days later.

Magnitude of the residue:

No residue data were provided with this submission, instead, the registrant stated the proposed EUP would not result in iprodione residues in excess of established tolerances for beans, dry^{bulb} onions, and potatoes.

To verify the registrant's statement, DEB reviewed residue data (aerial and ground) submitted in conjunction with the establishment of iprodione tolerances in or on beans (PP#4F3150, C. Deyrup memo dated 12/1/86). Based on these data we conclude that higher crop residues may result from aerial vs. ground application of iprodione at the same rate, however, the available data indicate that this proposed EUP will not result in iprodione

residues in excess of the established tolerances in or on beans (dry and succulent) at 2.0 ppm; bean forage and fodder at 90.0 ppm; dry bulb onion at 0.5 ppm; and potatoes at 0.5 ppm.

Conclusions:

1. 264-EUP-TI calls for aerial application of Rovral 4F to beans, dry bulb onions, and potatoes. Permanent tolerances are established for residues of iprodione in or on beans (dry and succulent) at 2.0 ppm; bean forage and fodder at 90 ppm; and dry bulb onions at 0.5 ppm. A temporary tolerance for iprodione in or on potatoes at 0.5 ppm will expire on 6/8/89. These tolerances were established based on ground applications of the pesticide.

2. Based on available residue data DEB concludes that 264-EUP-TI will not result in iprodione residues in excess of established tolerances in or on beans (dry and succulent) at 2.0 ppm; bean forage and fodder at 90 ppm; dry bulb onions at 0.5 ppm; and potatoes at 0.5 ppm.

3. The total acreage to be treated in connection with 264-EUP-TI is very small; 60 acres of beans; 84 acres of dry bulb onions; and 72 acres of potatoes.

Recommendations:

For the reasons cited in the above conclusions, we recommend in favor of 264-EUP-TI.

cc: Iprodione amended^{usc} file, S.F., R.F., Circ., F. Toghrol, R. Schmitt, Acting Branch Chief, PMSD/ISB, TAS staff(J. R. Tomerlin).

RDI: F. B. Suhre Acting Section Head (4/21/89): E. Zager: Acting Deputy Chief (4/21/89):

TS-H7509C:DEB:F.Toghrol:F.T.:RM:802:CM#2:4/21/89.