



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

7-25-84
OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JUL 25 1984

MEMORANDUM

SUBJECT: NO ACCESSION NUMBER
PP3F2964/FAP4H5415: Iprodione in or on Grapes and Grape
Fractions, Meat, Milk, Kidney and Liver, and Eggs.
Amended Section F, 4/20/84

Clarification of our review of 6/26/84.

TO: H. Jacoby, PM 21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

FROM: R. W. Cook *RWCook*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

In our review of subject petition dated 2/21/84 a number of deficiencies were noted. The petitioner responded to some of our comments in their letter of 4/6/84, however, only the portion of the submission concerning the tolerance expression was sent to RCB for review. The petitioner's letter which discussed the identification of Unknown Z as requested in our 2/21/84 review was not received in RCB. In light of the TOX review of 5/30/84 (see memo of A. Arce) which discussed the identification of Unknown Z, we requested the PM send this information to RCB for review.

The petitioner provided additional information regarding the identity of Unknown Z found in poultry liver. In TLC studies, Unknown Z has behavior similar to known compounds and the petitioner postulates that this material is a substituted 3,5-dichloroaniline compound. TOX Branch concludes that this identification is adequate. Based on the comparison of total combustible radioactivity and the residues detected by the common moiety (enforcement) method, we conclude that Unknown Z is accounted for in the enforcement method.

1/2

Conclusions and Recommendations:

Since TOX Branch is no longer concerned with further identification of Unknown Z, Recommendation #1 of our 6/26/84 review is now moot.

Recommendation #2 concerning the tolerances to be proposed is still pertinent: tolerances as recommended in Recommendation #2 of our 6/26/84 review should be proposed.

We could recommend for establishment of tolerances if the petitioner amends Section F as suggested above.

Note to PM:

In the FR Notice of 6/6/84 (p. 23445) regarding this petition, it is incorrectly stated that the proposed analytical method for determining residues is thin-layer chromatography. Thin-layer chromatography was used as an investigative tool in identification studies and is also used as a confirmatory procedure. However, the proposed analytical method is the gas chromatography method #151 discussed in our 2/21/84 review.

cc: R.F., Circu, R. Cook, TOX, EEB, EAB, PP# 372964/FAP4H5415
FDA, Robert Thompson
RDI: P. Errico for RSQ:7/24/84: RDS:7/24/84
TS-769: R. Cook: Raven: Edited by bj: RM-810: CM#2 7/25/84