6-26-84

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

JUN 26 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#3F2964/FAP 4H5415. Iprodione in or on Grape Fractions, Meat, Fat, Meat By-products and Eggs. No Accession Number. Amended Section F.

FROM: R. W. Cook, Chemist RW Cook
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch RD Schmitt for
Hazard Evaluation Division (TS-879)

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our previous considerations of subject petitions, we suggested several changes in tolerance levels and commodity terms (R. Cook, 2/21/84). The petitioner submits and amended Section F in response to our suggestions. Tolerances are proposed for combined residues of iprodione [3-(3,5-dichlorophenyl)-N-(1-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 the raw agricultural commodity grapes at 60 ppm and food additive tolerances for the above combined residues are proposed for raisins and raisin waste at 300 ppm and dried grape pomace at 225 ppm; these proposals agree with our recommendations.

In regard to milk, we previously concluded that combined residues of iprodione, its non-hydroxylated metabolites, and its hydroxylated metabolite (expressed as iprodione equivalents) will not exceed the proposed 0.3 ppm tolerance in milk. The current proposal for milk agrees with our recommendations.

The petitioner now proposes tolerances for combined residues of iprodione [3-(3,5-dichlorophenyl) -N-(1-methylethyl)-2,4-dioxo-

1-imidazolidinecarboximide and its non-hydroxylated metabolites (expressed as iprodione equivalents) in or on "Fat (Except Poultry Fat) Meat and Meat By-products (Except Liver and Kidney of Cattle, Goats, Hogs, Horses, and Sheep and Liver of Poultry" at 0.4 ppm; in "Liver and Kidney of Cattle, Goats, Hogs, Horses and Sheep" at 0.4 ppm; in Poultry Liver at 3 ppm; in Poultry Fat at 2 ppm; and in Eggs at 0.8 ppm. These proposals do not reflect our recommendations.

We recommended the following tolerances:

Combined residues of iprodione and its non-hydroxylated metabolites (expressed as iprodione equivalents) in or on the RACs:

COMMODITY	TOLERANCE
Meat and Meat By-products (except Liver and Kidney) of cattle, goats, hogs, horses, poultry and sheep	0.4 ppm
Liver and Kidney of cattle, goats, hogs, horses, poultry and sheep (except poultry kidney)	3 ppm
Fat of cattle, goats, hogs, horses, and sheep	0.4 ppm
Fat of poultry	2 ppm

Note: The above expression is pending further identification of Unknown Z (and whether TOX is concerned after identification) in poultry liver. The tolerance expression may have to be revised if TOX determines that Unknown Z needs to be regulated in liver.

In regard to our deferral to TOX Branch concerning the need for further identification of the metabolite designated Unknown Z in chicken liver, TOX Branch had indicated that Unknown Z should be identified (A.Arce, 3/19/84).

We therefore request that the petitioner provide further information on the metabolite called Unknown Z. RCB is unable to ascertain the residue of concern in chicken liver.

Recommendations

We recommend against the requested tolerances. For a favorable recommendation, we need the following:

1. Identification of Unknown Z in poultry liver.

2. Depending upon TOX considerations regarding Unknown Z in chicken liver, the following tolerances should be proposed:

FAT, MEAT AND MEAT BY-PRODUCTS

Tolerances are proposed for the combined residues of 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide and its non-hydroxylated metabolites (expressed as iprodione equivalents) in or on the following raw agricultural commodities:

COMMODITY	TOLERANCE
Meat, Fat, and Meat by-products (except liver and kidney of cattle, goats, hogs, horses and sheep	0.4 ppm
Liver and kidney of cattle, goats, hogs, horses, and sheep	3 ppm
Meat and meat by-products of poultry	0.4 ppm
Liver of poultry	3 ppm
Fat of poultry	2 ppm

cc:R.F., Circu, Reviewer, TOX, EEB, EAB, Ipridione S.F., PP#3F2964
FDA, Robert Thompson
RDI:RSQ:6/19/84
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