

6-28-88



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

JUN 28 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#6F3443. Iprodione on Rice. No EPA Accession Number.
Amendment of 5/19/88. RCB No. 3933.

FROM: R. W. Cook, Chemist *RWCook*
Tolerance Petition Section I
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: R. S. Quick, Section Head *RSQ*
Tolerance Petition Section I
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: L. Rossi, PM-21
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

Deficiencies Remaining To Be Resolved:

Revise Section F expressing the tolerance in terms of 40 CFR 188.399 (b).

Recommendations:

We recommend, against the establishment of the proposed tolerances for residues of iprodione (RP26019), its isomer (RP30228) and its metabolite (RP32490) in rice grain at 10 ppm, in rice straw at 20 ppm, poultry meat at 1 ppm, poultry meat by-products at 1 ppm, poultry fat at 3.5 ppm, poultry liver at 5 ppm and eggs at 1.5 ppm, since the expression of the tolerance is not adequate. The tolerance should be expressed in terms of 40 CFR 180.399 (b).

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Conclusions:

The petitioner should submit a revised Section F, to include the animal metabolite [N-(3,5-dichloro-4-hydroxyphenyl)-ureido-carboxamide in the proposed tolerances.

Discussion:

In our previous reviews, numerous deficiencies have been noted and resolved. (See memos of 9/8/87, 4/25/88, and 6/7/88). Currently the only outstanding deficiency remaining to be resolved is the need for the petitioner to propose tolerance levels adequate to cover expected residues in poultry meat, poultry meat byproduct, poultry liver, poultry fat and eggs. The petitioner addresses this matter in the current submission. The petitioner submits summary information ranking previously submitted rice grain residue data by percentile, claiming the 50th percentile is 0.82 ppm and the 95th percentile is 4.5 ppm the petitioner then uses the residue level at the 95 percentile to calculate dietary burden in animals. Based on this number, the petitioner has proposed higher tolerance levels for poultry products, as tabulated below.

<u>Commodity</u>	<u>Proposed Tolerance</u>	<u>Current Tolerance</u>
Poultry meat	1.0	0.4
Poultry meat byproducts*	1.0	0.4
Poultry fat	3.5	2
Poultry liver	5.0	3
Eggs	1.5	0.8

*except kidney & liver

Proposed tolerances are for combined residues of iprodione, its isomer, and its metabolite, all expressed as iprodione equivalents. This expression is similar to 40 CFR 180.399(a) but adds "expressed as iprodione equivalents". However, residues of iprodione in animal commodities are regulated under 40 CFR 180.399(b) which includes, in addition to the above listed compounds, the animal metabolite [N-(3,5-dichloro-4-hydroxyphenyl)-ureido-carboxamide]. The petitioner should submit a revised Section F to include the regulated animal metabolite [N-(3,5-dichloro-4-hydroxyphenyl)-ureido-carboxamide].

We consider the numerical levels of the proposed tolerance to be appropriate, but not the expression of the tolerance.

cc:R.W. Cook (RCB), PP6F3443, E. Eldredge (ISB/PMSD), Circulation (7), Reading File.

TS-769C:RCB:R.W. Cook:MT:CM#2:Rm.810H:557-7324:6/27/88

RDI:R.S. Quick; 6/23/88:R.D. Schmitt; 6/23/88