



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MAR 29 1982

SUBJECT: 82-WI-02. Proposed Section 18 exemption for the use of iprodione on lettuce.

FROM: Edward Zager, Chemist
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THRU: Charles L. Trichilo, Chief
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TO: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The State of Wisconsin Department of Agriculture, Trade and Consumer Protection requests a Section 18 exemption for the use of Rovral 50 WP (50% iprodione) to control bottom rot and drop disease on lettuce.

The proposed use would permit 2 ground applications, 14 days apart at the rate of 0.5-1.0 lb act/A with a 10 day PHI.

The metabolism of iprodione in plants was discussed in our review of PP#OG2402. The residue of concern is iprodione (3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidine-carboxamide) and its metabolite RP 30228 (3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide).

Residue data from 7 studies in NY and WI have been submitted with this request. The analytical method used to generate the residue data was Rhodia Analytical Method No. 151. The method determines iprodione, its metabolite RP 30228 and another metabolite of iprodione RP 32490 [3-(3,5-dichlorophenyl) 2,4-dioxo-imidazolidine carboxamide]. The method has been found adequate for enforcement purposes (L. Propst, 11/28/80, PP#OG2402).

Following 2 applications of 1-2 lbs act/A (1-2X the maximum proposed application rate) no detectable residues of iprodione (<0.05 ppm) were found in field trimmed lettuce at PHI's of 9-22 days. Following 3 applications at the 1 lb act/A rate residues of iprodione ranged up to 0.12 ppm in field trimmed lettuce at a 22 day PHI. Residues in lettuce wrapper leaves were higher and ranged up to 0.65 ppm at a 9 day PHI from 2 applications of 1 lb act/A. No detectable (<0.05 ppm) residues of the metabolites RP 30228 and RP 32490 were found in any lettuce or lettuce wrapper leaves samples.

Based on the above data we estimate that residues of iprodione and its metabolite RP 30228 will not exceed 0.5 ppm in or on lettuce as a result of the proposed use.

Meat, Milk, Poultry and Eggs

Provided a restriction against the feeding of treated lettuce wrapper leaves is added to the Section 18 label, there will be no problem with secondary residues in meat, milk, poultry or eggs.

Conclusions

1. Residues of iprodione and its metabolite RP 30228 will not exceed 0.5 ppm in or on lettuce as a result of the proposed use.
2. Provided a restriction against the feeding of treated wrapper leaves to livestock is added to the Section 18 label, the proposed use will not lead to secondary residues in meat, milk, poultry or eggs.

Recommendation

TOX considerations permitting and provided a restriction against the feeding of treated wrapper leaves to livestock is added to the Section 18 label, we have no objections to this Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated lettuce in commerce.

cc: Iprodione S.F.
Section 18 S.F. Iprodione
R.F.
Circu
Reviewer
TOX

RDI:Section Head:RJH>Date:3/24/82:RDS>Date:3/24/82
TS-769:Reviewer:E.Zager:LDT:X77324:CM#2:RM:810>Date:3/26/82