

Shaughnessy No.: 109801

Date Out of EAB: DEC 31 1987

To: Lois Rossi
Product Manager # 21
Registration Division (TS-767)

From: Therese M. Dougherty, Chief
Environmental Chemistry Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769-C)



THRU: Paul F. Schuda, Chief
Exposure Assessment Branch/HED (TS-769C)



Attached, please find the EAB review of...

Reg./File # : 359-685

Chemical Name: Iprodione

Type Product : Fungicide

Product Name : Rovral Fungicide

Company Name : Rhone-Poulenc Inc.

Purpose : Review request to amend label to add tomatoes, sugar beets,
and cotton as crops to be rotated after harvest (study submitted).

Date Received: 10/16/87

Action Code: 305

Date Completed: DEC 31 1987

EAB #(s): 80036

Monitoring study requested:

Total Reviewing Time: 0.7 day

Monitoring study voluntarily:

Deferrals to : Ecological Effects Branch
 Residue Chemistry Branch
 Toxicology Branch

1. CHEMICAL: Common name:

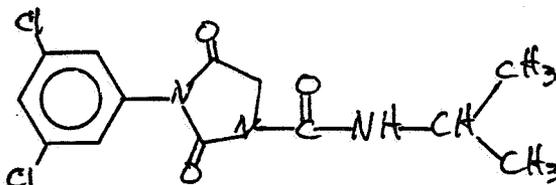
Iprodione

Chemical name:

3-(3,5-Dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide.

Trade name(s):

Rovral, RP 26019, Glycophene

Structure:Formulations:

50% WP

Physical/Chemical properties:Molecular formula: $C_{13}H_{13}Cl_2N_3O_3$.

Molecular weight: 329.9

Physical state: White, odorless, nonhygroscopic crystals.

Solubility: Soluble in acetone and benzene. Almost insoluble in water (13 mg/L).

2. TEST MATERIAL:

Not applicable. No data were submitted.

3. STUDY/ACTION TYPE:

The registrant is requesting the addition to the label of tomatoes, sugar beets, and cotton as crops that may be rotated after harvest and has submitted a rotational crop study to be reviewed.

4. STUDY IDENTIFICATION:

- Residue data on California sugar beets, cotton, and tomatoes grown in soil following sequential treatments of Rovral, Report No. ASD 87/231, Acc. # 401592-01.

5. REVIEWED BY:

Herbert L. Manning, Ph.D.
Microbiologist
EAB/HED

Signature: *Herbert L. Manning*

Date:

DEC 31 1987

6. APPROVED BY:

Therese M. Dougherty, Chief
Section 1
EAB/HED

Signature: *Therese M. Dougherty*

Date:

DEC 31 1987

7. CONCLUSION:

EAB reviewed the rotational crop study designed to support their proposed label amendment that would allow rotating tomatoes, cotton, and root crops (based on no residues in sugar beets) after harvest, and agree with their findings of no detectable residues in these crops.

8. RECOMMENDATIONS:

The field rotational crop studies submitted are acceptable in satisfying this data requirement and allows tomatoes, cotton, and root crops (based on no residues in sugar beets) to be added to the label as crops that may be rotated one month after the last iprodione (Rovral) treatment.

It must be stated again, however, that the "crop" listed as Leafy Vegetables (see Note to User on label) should be replaced by Head Lettuce, since only this leafy vegetable has an established tolerance. Other leafy vegetables that do not have tolerances would require a confined rotational crop study.

The second line in the NOTE TO USER statement refers to rotating cereal grains, and soybeans, one year after treatment. We cannot support these rotations. We have no rotational crop data on these crop groupings/crops, therefore, radiolabeled, confined rotational crop studies are required for them.

9. BACKGROUND:

A. Introduction- Rhone-Poulenc requests amending their Rovral label to add tomatoes, sugar beets, and cotton as crops to be rotated after harvest and to eliminate the word "tomatoes" as a crop to be rotated the year following treatment (located under Note to User on label). Tomatoes were the subject of a previous amendment (review of 12/17/87) to add them to the label with the restriction not to rotate before one year after treatment.

B. Direction for Use- See attached label.

10. DISCUSSION OF INDIVIDUAL STUDY:

- A. Study Identification- Residue data on California sugar beets, cotton, and tomatoes grown in soil following sequential treatments of Rovral.
- B. Materials and Methods- The "rotated" crops (tomatoes, sugar beets, and cotton) were planted to bare ground one-month after the last of 10-one pound ai/A, weekly treatments. The one pound ai/A treatment is the maximum label rate.
- C. Results- Table 1 summarizes the results of the study. Pages 25 and 41 show the computer printout of the plant and recovery analyses, for sugar beets and tomatoes/cotton, respectively. Residues of parent (RP-26019), its isomer (RP-30228), and metabolite (RP-32490) were not detected (sensitivity of GLC method was 0.05 ppm) in the plant parts analyzed. See Figure 1 for structures of residues.
- D. Author's Conclusions- Residues of iprodione did not accumulate in tomatoes, sugar beets, and cotton when they were planted one month after 10-one pound ai/A, weekly treatments. The residues analyzed for were parent (RP-26019), an isomer (RP-30228), and a metabolite (RP-32490), all of which were significant residues in a ¹⁴C confined rotational crop study.
- E. Reviewer' Comments- EAB agrees with the author's conclusions. The study follows our guidelines and is acceptable in satisfying the field rotational crop data requirement for tomatoes, cotton, and root crops (sugar beets).

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CONFIDENTIAL APPENDIX:

Contains supporting information.

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Reproductive EF Reviews

Page _____ is not included in this copy.

Pages 5 through 15 are not included.

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- Identity of product impurities.
- Description of the product manufacturing process.
- Description of quality control procedures.
- Identity of the source of product ingredients.
- Sales or other commercial/financial information.
- A draft product label.
- The product confidential statement of formula.
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Proprietary EF Reviews

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