

4-5-84

109801
SHAUGHNESSEY NO.

19
REVIEW NO.

EEB BRANCH REVIEW

DATE: IN 2-9-84 OUT 4-5-84

FILE OR REG. NO. 359-EUP-AA

PETITION OR EXP. PERMIT NO.

DATE OF SUBMISSION 2-1-84

DATE RECIEVED BY HED 2-7-84

RD REQUESTED COMPLETION DATE 4-17-84

EEB ESTIMATED COMPLETION DATE 4-10-84

RD ACTION CODE/TYPE OF REVIEW 750/EUP

TYPE PRODUCT(S): I, D, H, F, N, R, S Fungicide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. H. Jacoby (21)

PRODUCT NAME(S) Rovral

COMPANY NAME Rhone-Poulenc Inc.

SUBMISSION PURPOSE Proposed EUP for use on Peanuts

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
109801	IPRODIONE:	
	3-(3,5-dichlorophenyl)-N-(1-methylethyl)	
	-2,4-dioxo-1-imidazolidinecarboxamide	50

Pesticide Name: Rovral

Application for Experimental Use Permit

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

Rhone-Poulenc Inc. is requesting on EUP for Rovral to evaluate its use on peanuts.

100.1.1 Objective

The EUP will attempt to gather efficacy and phytotoxicity data for peanuts. Residue samples (fresh market and processing) will also be studied.

100.1.2 Duration/Date/Amounts

The proposed period for the EUP is from June, 1984 through September 1984 (4 months). 60,000 lbs. product (30,000 lbs. ai.) are requested.

100.1.3 Geographical Distribution

<u>STATE</u>	<u>No. Tests</u>	<u>Plot size</u>	<u>Total Acres</u>	<u>No. Applications</u>	<u>Total lbs. a.i.</u>
VA	60	100	6000	3	36,000
NC	20	100	2000	3	12,000
OK	10	100	1000	3	6,000
TX	10	100	1000	3	6,000

100.2 Formulation Information

Active Ingredient:

Iprodione: 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-
2,4-dioxo-1-imidazolidinecarboxamide.....50%

Inert Ingredients.....50%

100.3 Application Methods, Directions, Rates

The "program details" section (G.3) of the application states that Rovral is to be applied to peanuts by commercial application equipment. According to the product label, this can be either ground spray equipment or aerial application, which is only recommended during the "Bloom Period".

There will be three(3) foliar applications of 2 lbs. product (1 lb. a.i.) per acre. These are to be applied from June through September "when conditions first became favorable for disease development. Up to 2 subsequent applications at 4 week intervals".

100.4 Target Organisms

Sclerotinia blight (Sclerotina sp.)

100.5 Precautionary Labeling

"Environmental Hazards - Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

101 Hazard Assessment

101.1/101.2 Discussion/Likelihood of Exposure

Iprodione is practically non-toxic to mammalian and avian species with LC₅₀'s for non-target indicator species in the 10,000-20,000 ppm range. Aquatic indicator species are more sensitive however with LC₅₀'s ranging from 0.43 - 7.2 ppm (see chemical profile in review jacket 109801 for Iprodione). Theoretical calculations indicated that the rate proposed in this EUP would not result in a hazard to aquatic species. A 2 lb. per acre direct application to a 6" acre-layer of water = 1.5 ppm. We expect that even with significant runoff (e.g. 5% per acre) a non-lethal residue level would result in 6" - acre layer of water.

101.3 Endangered Species

No hazards are expected for endangered species due to the low toxicity to both terrestrial and aquatic indicator species.

101.4 Adequacy of Toxicity Data

Current data base is adequate to support the Agency's EUP requirements.

101.5 Adequacy of Labeling

No changes required for EUP.

103 Conclusions

EEB has reviewed the application by Rhone-Poulenc Inc. for an EUP to use Rovral on peanuts at 2 lb/acre. We find that this experimental use should not result in unreasonable adverse acute or chronic effects on non-target fish and wildlife if used according to label directions.

John Bascietto 4/9/84

John Bascietto
Wildlife Biologist, Sec. 3
Ecological Effects Branch
Hazard Evaluation Division

David Copping 4/9/84

David Copping
Ecological Effects Branch
Hazard Evaluation Division

Clayton Bushong 4/9/84

Clayton Bushong
Branch Chief
Ecological Effects Branch, HED

IPRODIONE

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Pages 5 through 9 are not included.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients.
 - ☐ 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.
 - ☐ Information about a pending registration action.
 - ☐ FIFRA registration data.
 - ☐ The document is a duplicate of page(s) .
 - ☐ The document is not responsive to the request.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

G.2

STATE, AMOUNT OF PESTICIDE TO BE USED AND ACREAGE

State	Rovral (lb/A)	Number of tests	Total Acreage	Number of Applications	Total lbs ai
VA	2.0	60	6000	3	36,000
NC	2.0	20	2000	3	12,000
OK	2.0	10	1000	3	6,000
TX	2.0	10	<u>1000</u> 10,000	3	<u>6,000</u> 60,000

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G.3

PROGRAM DETAILS

a. Target Pest	Sclerotinia blight (<u>Sclerotinia</u> sp.)
b. Crop	Peanuts
c. Sites	Commercial Fields
d. Major Geographic Areas	See Item G.2
e. Desired Months for Application to Begin	June
f. Use Pattern	3 foliar applications
g. Plot Size	100 Acres
h. Number of Replications	None: The plots will be divided into at least 4 subplots for evaluation
i. Dosage Rates	2.0 lb product/A
j. Methods of Application	Commercial Application Equipment
k. Season of Use	June-September
l. Timing of Applications	1. When conditions first become favorable for disease development 2. Up to 2 subsequent applications at 4 week intervals

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G.4

OBJECTIVES

- a. The major objectives of this program are to obtain:
- i. Efficacy and phytotoxicity data for Rovral applied to peanuts using commercial equipment and
 - ii. Residue samples from peanuts (fresh market and processing) treated with Rovral using commercial equipment.

G.5

EXPLANATION TO JUSTIFY THE QUANTITY OF ROVRAL REQUESTED

The information in Item G.2 shows the following:

- A total of 10,000 acres will be treated with Rovral.
- The tests will have a maximum of 3 applications.
Therefore,

$$10,000 \text{ acres} \times 3 \times 2.0 \text{ lb/A} = 60,000 \text{ lbs}$$

- The total Rovral required will be 30,000 lbai or 60,000 lbs formulated.

G.6

PROPOSED SUITABLE DURATION FOR THE PERMIT PROGRAM

A duration of 1 year should be adequate to evaluate Rovral on peanuts for Sclerotinia blight (Sclerotinia sp.) control.

G.7

METHOD OF DISPOSITION OF ANY UNUSED MATERIAL AT THE CONCLUSION OF TESTING PROGRAM

Unused Rovral, at the conclusion of this testing program, will be returned to Rhone-Poulenc Inc.'s formulating facility.