



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

JUN 7 1988

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP6F3443. Iprodione on Rice. EPA Accession Number  
221435, 221430. RCB Nos. 3794, 3795. Amendment of  
4/26/88.

FROM: R. W. Cook, Chemist *RWC*  
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)

Deficiencies Remaining To Be Resolved

1. Propose higher poultry and egg tolerance

Recommendations

We recommend against the establishment of the proposed tolerances for residues of iprodione (RP26019) and its isomer (RP30228) and its metabolite (RP32490) in rice. Existing tolerance levels are not adequate to cover expected residues of iprodione, its isomer, and its metabolite.

The petitioner should propose tolerance levels adequate to cover expected residues of iprodione, its isomer, and its metabolite in poultry meat and meat byproducts, poultry fat, poultry liver, and eggs.

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Conclusions:

1. Combined residues of iprodione and its isomer and its metabolites are likely to exceed the established tolerances in poultry meat and meat byproducts, poultry liver, poultry fat, and eggs. The petitioner should propose tolerance levels adequate to cover expected residues in poultry fat, and eggs.
2. The catfish/crayfish label restriction has been added and this deficiency is resolved.

Discussion:

In our previous reviews of subject petition (see memos of 9/8/87 and 4/25/88) several outstanding deficiencies were noted. The first deficiency related to the need for higher tolerance levels for poultry and eggs. This deficiency remains outstanding.

The second deficiency involved a catfish/crayfish label restriction.

The petitioner, by letter of 4/26/88, contends that the requested restriction "Do not apply in areas where catfish and crayfish are commercially cultivated." is not warranted. The petitioner argues that:

- 1). the relatively low levels of iprodione in rice fields,
- 2). the short half life in rice water, and
- 3). the reaction of both fish species to these levels are adequate reasons which demonstrate the catfish/crayfish restriction is not warranted. However the petitioner states " ... we would reluctantly be willing to add this statement for now ..."

We have considered the petitioner's arguments. We conclude that label restriction against use of iprodione in areas where commercial catfish and crayfish farming is practiced is warranted. Alternately, the petitioner should submit field residue data reflecting residues in catfish and crayfish and if necessary propose tolerances for residues of iprodione in fish and shellfish.

We conclude the deficiency regarding the label restriction is resolved at this time. We note the petitioner adds the label restriction reluctantly.

cc:R.W. Cook (RCB), PP6F3443, E. Eldredge (ISB/PMSD),  
Circulation (7), RF.  
TS-769C:RCB:R.W. Cook:MT:CM#2:Rm.810H:557-7324:6/3/88  
RDI:R.S. Quick; 6/1/88:R.D. Schmitt; 6/1/88