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

APR - 8 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 91-NC-02. Section 18 Exemption. Iprodione on Tobacco. No MRID #. DEB # 7773.

FROM: Leung Cheng, Chemist
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Health Effects Division (H7509C)

THROUGH: Francis B. Suhre, Section Head for
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TO: Susan Stanton, PM # 41
Emergency Response/Registration Support Branch
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and

Toxicology Branch
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The State of North Carolina, Department of Agriculture has requested a Section 18 registration for the use of Rovral^{R} fungicides (EPA Reg # 264-453 & 264-482) on tobacco. The active ingredient is 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide or iprodione.

Tolerances are established for residues of iprodione, its isomer 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide (RP30228), and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide (RP32490) in or on various fruits and vegetables ranging from 0.1 to 60 ppm, and 90 to 150 ppm in forage and hay. Tolerances on meat, milk, poultry and eggs are established at 0.5-3.0 ppm [40 CFR 180.399].

The proposed use would permit ground applications at 0.5-1.0 lb ai/A/treatment. Up to 3 lbs ai/A may be applied in one year. No retreatment intervals and pre-harvest interval are specified.

A Registration Standard has not been completed for iprodione. Use on tobacco is not permitted on the current labels.

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Our guidelines state that a tolerance or an exemption from the requirement of a tolerance is not required for pesticide use on tobacco. However, a residue profile in the tobacco and its smoke is still needed for assessing exposure of people to pesticide residues at the time of use of the tobacco. This normally includes the use of radioisotopic techniques to identify the significant components of the residue. If residues at $\geq$ 0.1 ppm are detected in green tobacco, then determination of residues in cured or dried tobacco and in the pyrolysis products is required.

No residue data were submitted for tobacco. However, on the basis of bean forage residue data, iprodione residues on green tobacco are likely to be substantially higher than 0.1 ppm (up to 25 ppm parent + RP30228 + RP32490 after 2 x 1 lb ai/A and PHI's of 15-18 days, MRID # 92083036, Phase III summary). CBRS expects even higher iprodione residues in cured or dried tobacco.

CONCLUSIONS AND RECOMMENDATION

1. No retreatment intervals and pre-harvest interval are specified on the proposed label.

2. No tobacco residue data are available. However, CBRS expects iprodione residues on green tobacco to be substantially higher than 0.1 ppm and even higher on dried or cured tobacco based on bean forage residue data.

3. Residue data are needed so that exposure to iprodione residues in tobacco may be conducted.

CBRS can not recommend in favor of this Section 18 request in view of the above conclusions.

cc:Circ, RF, Section 18 F, Cheng, DRES, PIB/FOD
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