4-9-82

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

APR 9 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-NY-06. Proposed Section 18 exemption for iprodione on lettuce.

FROM: Richard Loranger, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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for Richard Loranger, Ph.D.

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Donald Stubbs, Product Manager #41
Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

The Cooperative Extension of New York is requesting a Section 18 exemption for the use of iprodione (Rovral) to control drop disease in lettuce.

The proposed use entails 3 applications of 1 lb ai/A by ground equipment (100 gal/A) starting at the three leaf stage. Ten day intervals to the second and third applications are to be observed. Recently Wisconsin requested the use of 2 applications of Rovral 50 WP (50% iprodione) with a 14 day PHI to control lettuce drop (E. Zager, 3/29/82).

The residue of concern for iprodione consists of the parent [3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxoimidazolidine-1-carboxamide] and the isomer RP 30228 [3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide]. These two compounds as well as the metabolite RP32490 [3-3,5-dichlorophenyl)-2,4-dioxoimidazolidine] are determined by Rhodia Analytical Method No. 151 (PP#0G2402, L. Propst, 11/28/80). The method is adequate for enforcement purposes.

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At three test sites in New York, residue data were obtained reflecting the proposed 1 lb ai/A application at the three leaf stage followed by two 1 lb ai/A applications at 7-11 day intervals (20-23 day PHI's). Residues of parent iprodione in trimmed lettuce heads ranged from ND (<0.05 ppm) to 0.12 ppm. In wrapper leaves residues were much higher (0.66-1.37 ppm). For all head and leave samples residues of the isomer RP30228 and metabolite RP 32490 were below 0.05 ppm. Based on the level of residues in wrapper leaves and taking into account the limited quantity of data, we estimate that iprodione residues from the proposed use could be high as 1 ppm. A 21 day PHI should be added to the label to ensure residues remain below that level. Also, a restriction against use of Rovral on leaf lettuce is needed.

There will not be secondary residues of iprodione in meat and milk provided a restriction against feeding treated wrapper leaves to livestock is added to the label.

Conclusions

1. Provided that a 21 day PHI and restriction against use on leaf lettuce are added to the label, residues of iprodione and its metabolite RP 30228 on lettuce from the proposed use will not exceed 1 ppm.

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

Contingent upon the addition to the label of the 21 day PHI and leaf lettuce and feeding restrictions noted above, we have no objections to the granting of the proposed emergency use, TOX considerations permitting. An agreement should be made with FDA regarding the legal status of treated lettuce in commerce.

cc: R.F., Circu, Reviewer, Subject file, Section 18 S.F., TOX

RDI:Section Head:Acting ARR:Date:4/7/82:RDS:Date:4/7/82
TS-769:Reviewer:R.Loranger:LDT:X77324:CM#2:RM:810:Date:4/9/82