

**Appendix B. Use verification memo from the Special Review and Reregistration Division.**



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

PC Code: 109801

**DATE:** 03/24/2009

**SUBJECT:** Verification Memorandum for Iprodione for Red Legged Frog Assessment

**FROM:** James Parker, Chemical Review Manager  
Special Review Branch or Reregistration Branch 1  
Special Review & Reregistration Division (7508P)  
AND  
Mary Waller, Product Manager  
Fungicide Branch, Registration Division (7505P)

*James S. Parker 3/24/09*  
*Mary L. Waller 3/25/09*

**THRU:** Laura Parsons, Team Leader  
Special Review Branch or Reregistration Branch 1  
Special Review & Reregistration Division (7508P)

*Laura Parsons 4/2/09*

**TO:** Rafael Prieto  
Usage and Label Use Team  
Biological Economic and Analysis Division (7503P)

This memorandum serves to provide additional information on the use pattern of Iprodione not captured in the LUIS process. RD and SRRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and SRRD.

SRRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"<sup>1</sup> report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED Spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification" section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

Finally, if further clarification is needed please contact James Parker and Mary Waller.

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<sup>1</sup> This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain: 1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active California special local needs (SLN) registrations.

## **Registration and Reregistration Verification**

### **Date and Scope of the RED**

- The Iprodione RED was completed in September 1998.
- The RED assessed Iprodione (PC code 108901, CAS# 36734-19-7) and 3,5-DCA (3,5 dichloroaniline) as a metabolite/degradate of toxicological concern.

### **Label Uses/Rates and Mitigation**

- All herbaceous ornamental seed treatment uses and all residential uses for Iprodione, were cancelled (March 3, 1999, OPP-64040; FRL-6061-9 and EFED Spreadsheet).
- Surface water monitoring studies are currently being conducted in NJ (one) and FL (two) for exposure to the iprodione degradate known as 3,5 DCA. A ground water monitoring study is also being conducted in NY based on iprodione degradate (3,5 DCA) exposures.
- Revised Labels were submitted in August of 1999. EPA approved these labels in early 2000.
- RED mitigation limited the maximum number of applications applied to non-residential turf, lawn, golf courses, ornamental trees, and ornamental plants from “unlimited” to 6 per year with a maximum annual application rate of no more than 24 lbs. of active ingredient.
- RED mitigation required labels to include a label warning that requires a buffer strip of at least 25-feet for application of iprodione adjacent to water bodies such as lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries, and commercial fish ponds (except for the use on golf courses).
- Labels also required spray drift and invertebrate warning language, in addition to Arkansas endangered species language for the rice use only (that can be found in the Iprodione RED on pages 167 & 168), which includes label warnings to prevent application of iprodione when wind direction is toward aquatic area.

### **Application Restrictions**

*“If applying this product adjacent to a water body such as a lake, reservoir, river, permanent stream, marsh or natural pond, estuary, or commercial fish pond, there must be at least a 25-foot vegetative buffer strip between the water body and the point of application. Do not apply this product when the wind direction is toward aquatic area.”*

*“This pesticide is toxic to invertebrates. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.”*

*For Turf Use Only: May apply up to but no more than 24 pounds a.i. annually, with a maximum application rate of 8 lbs. a.i.. Product may be applied up to 6 times per year. There must be at least a 30-day interval between applications.*

*“For Rice Use Only: Do not apply in areas where catfish and crayfish are commercially cultivated.”*

*“This product is not registered for use at residential sites.”*

**For granular formulation:**

*“This pesticide is toxic to invertebrates. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Cover, incorporate, or clean up spills. Do not contaminate water when disposing of equipment washwater or rinsate.”*

**Endangered Species:**

**For Rice Use Only:   ENDANGERED SPECIES RESTRICTIONS IN THE  
STATE OF ARKANSAS**

The use of Iprodione on rice is restricted to protect the endangered fat pocketbook pearly mussel (*Potamilus capax*) and its habitat. Use is prohibited in the following areas of Arkansas.

**Mississippi County:** Within the basin that drains directly into the Right Hand Chute of Little River, south of Big Lake National Wildlife Refuge.

**Poinsett County:** Between Crowley’s Ridge and the levee east of the Right Hand Chute of Little River and the St. Francis Floodway. Use is also prohibited west of Rt. 140 and north of Rt. 63 at the siphon near Marked Tree. Except that the prohibited area does not include the area bounded by Arkansas Highway 373 on the west, Highway 63 on the east and Highway 14 on the south.

**Cross, St. Francis and Lee Counties:** Between Crowley’s Ridge and the levee east of the Right Hand Chute of Little River and the St. Francis Floodway as far south as the confluence of L’Anguille River (Lee County).

- The Iprodione LUIS report is not a “Data Doer Only” report and includes all active Section 3 registrations and all California Section 24 (c) registrations for Iprodione.

**Status of Product Reregistration**

- Product reregistration for Iprodione was completed on September 17, 2002

**Registration Division Review**

- There are no pending new uses except for an import tolerance petition on canola which will not result in a registration within the U.S.
- Since 12/01/08, the Agency has registered one me-too product on 2/05/09 (EPA registration number 85488-1). The product is used on cotton, peanuts, fruit trees and nuts (almonds, apricots, cherries, nectarines, peaches, plums, plumcots, prunes), small fruit (caneberries, bushberries, and strawberries), ginseng, grapes, and vegetables (snap, dry, and lima beans, broccoli, carrots, chinese mustard, dry bulb onions, garlic, head and leaf lettuce, potatoes). The application rates and timing do not differ in anyway from the currently registered iprodione registrations.
- There is also a pending me-too (EPA file symbol 432-RLNL) which is anticipated to be completed in May 2009. Furthermore, the use patterns will not differ in anyway from the currently registered iprodione registrations.