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

5-6-82

MAY 6 1982

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 82-NJ-18. Proposed Section 18 exemption for the use of iprodione on onions and leeks in New Jersey

FROM: Edward Zager, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

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

TO: Emergency Response Section  
Registration Division (TS-767)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

The New Jersey Department of Environmental Protection requests a Section 18 exemption for the use of iprodione for the control of white rot on onions and leeks.

The proposed use would permit two aerial or ground applications, one at seeding in the fall and one in early spring at the rate of 1 lb act/A. There will be a 30-day PHI. We have been informed by L. Welch (5/4/82) that the use is not expected to start until the fall of 1982.

The metabolism of iprodione in plants was discussed in our review of PP#OG2402. The residue of concern is iprodione (3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidine carboxamide) and its metabolite RP30228 (3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide).

Residue data from 3 studies in N.J. have been submitted with this request. The analytical method used to generate the

residue data was Rhone-Poulenc Analytical Method No. 151. The method determines iprodione, its metabolite RP30228 and another metabolite of iprodione RP32490 [3-(3,5-dichlorophenyl)-2,4-dioxo-imidazolidine carboxamide]. The method has been found adequate for enforcement purposes (L. Propst, 11/28/80, PP#OG2402).

Following 1 or 2 applications at the rate of 1 lb act/A residues of iprodione ranged from 0.08-0.36 ppm in or on onions (scallions) at PHI's of 61-65 days. No detectable (<0.05 ppm) residues of RP30228 and RP32490 were found in any of the samples. No residue data reflecting the proposed 30-day PHI are available.

Based on the above residue data for onions and translating the onion data to leeks we estimate that residues of iprodione and its metabolite RP30228 will not exceed 0.5 ppm in or on onions and leeks at a 60-day PHI.

#### Meat, Milk, Poultry and Eggs

There are no feed items involved in this use. Consequently, there will be no problem with secondary residues in meat, milk, poultry or eggs.

#### Conclusions

1. Residues of iprodione and its metabolite RP30228 will not exceed 0.5 ppm in or on onions and leeks at a 60-day PHI.
2. There are no feed items involved in this use. Consequently, there will be no problem of secondary residues in meat, milk, poultry and eggs.

#### Recommendation

TOX considerations permitting, and provided a 60 day PHI is imposed on this use, we have no objections to the proposed Section 18 exemption. An agreement should be made with FDA regarding the legal status of the treated onions and leeks in commerce.

cc: Section 18 S.F.  
Ipropdione S.F.  
Circu  
R.F.  
Reviewer  
TOX

RDI:Section Head:RJH>Date:5/4/82:RDS>Date:5/4/82  
TS-769:RCB:Reviewer:E.Zager:LDT:X77324:CM:#2:RM:810>Date:5/4/82