

US EPA ARCHIVE DOCUMENT

5-15-85



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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MAY 15 1985

MEMORANDUM

SUBJECT: PP# 4F3111, Iprodione on Onions, Revised Sections B and F. Submission of February 7, 1985. (No Accession Number, RCB #775).

FROM: E. T. Haeberer, Chemist *E.T. Haeberer*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Robert Quick, Section Head *RM*  
Petition Review Section #1  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO: Henry Jacoby, PM Team No. 21  
Registration Division (TS-767)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

In response to our memo of November 28, 1984, (PP# 4F3111, E. T. Haeberer), Rhone-Poulenc, Inc., has submitted revised Sections B and F.

The deficiencies listed in the conclusion section of the above review were as follows:

- 2b. We can draw no conclusions concerning the adequacy of the analytical methodology for enforcement of the proposed tolerance in green onions until validation data are submitted for green onions.

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3. The label does not indicate whether the use is intended for green onions or dry bulb onions. The use directions also do not state whether application is for seeded onions or onions grown from sets. There is no PHI for the White Rot use. Our conclusions assume that both uses apply both to green onion and dry bulb onions and to onions grown from both seed and sets.
- 3a. We can draw no conclusions concerning the adequacy of the proposed tolerance for dry bulb onions until additional residue data reflecting adequate geographical representation are provided which reflect the proposed use at maximum levels on plants grown from onion sets.
- 3b. The petitioner has not proposed a PHI for furrow and spring spray usage. Section B should be amended to include a PHI for that use.
- 3c. We can draw no conclusions concerning the adequacy of the proposed tolerances on green onions. Additional data are needed reflecting foliar application at the maximum proposed use level on plants grown from seed. In addition, data are needed for both furrow and foliar application patterns, at maximum proposed use levels, on green onions grown from onion sets. PHI's should be proposed for both use patterns. The green onion data should reflect good geographical representation.

The petitioner has submitted a revised section F which proposes a tolerance of 0.5 ppm in/on dry bulb onions. The proposal for green onion has been deleted.

A revised section B which restricts use to ground foliar spray applications at the rate of 1.5 lbs ai/A for control of Botrytis leaf blight and Purple blotch, was also submitted. A seven-day spray interval with a maximum of ten applications per season and a seven-day PHI is specified.

The questions relating to green onions have been resolved because green onions have been withdrawn from the petition.

With respect to dry bulb onions, the in-furrow and spring uses have been deleted from the label. We agree with the petitioner, that for the remaining use, dry bulb onions grown from seed will represent the worst case situation because more applications could be made to onions grown from seed. The requested data for onions grown from sets are now unnecessary.

The questions raised in conclusions 2b, 3, 3a, 3b and 3c are resolved. The residue data support the proposed tolerance.

TOX and EAB considerations permitting, we can recommend for establishment of the proposed 0.5 ppm tolerance in/or dry bulb onions.

The International Residue Status sheet was attached to our earlier December 28, 1984, review.

cc: R.F., Circu, Haeberer, Thompson, FDA, TOX, EEB, EAB, PP#4F3111, PMSD(I&B)  
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edit by LJ:5/14/85