

US EPA ARCHIVE DOCUMENT

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

SEP 10 1985
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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP#5F3241 [RCB #962]. Iprodione (Rovral®) in/on Almonds.
Evaluation of Amendment Dated July 19, 1985 (No
Accession Number).

FROM: Michael P. Firestone, Ph.D., Chemist *M. P. Firestone*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: John H. Onley, Ph.D., Section Head *John H. Onley*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry Jacoby, Product Manager Number 21
Fungicide-Herbicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Phone-Poulenc Inc. has submitted this amendment consisting of a cover letter from N. Somma of Phone-Poulenc to H. Jacoby of EPA and a revised Section F, in response to the only outstanding deficiency (#4) discussed in RCB's 6/26/85 review of PP#5F3241. This deficiency will be restated below, followed by the petitioner's response and RCB's comments/conclusions.

Deficiency #4

While the residue data adequately support the proposed 2.0 ppm tolerance for almond hulls, the established 0.05 ppm tolerance for almond nutmeat is not supported (see Residue Data Section of this review).

1/3

Normalizing the residue data reflecting total treatment at 1.25X, the residue level in almond nut meat resulting from iprodione treatment at the proposed 1X rate would be 0.19 ppm. Taking into consideration the preceding, the adequacy of the analytical procedure, and the limited number of field trials (4), the petitioner will need to submit a revised Section F in which a tolerance of 0.3 ppm ppm is proposed for almond nutmeat.

Petitioner's Response

A revised Section F has been submitted in which a tolerance for iprodione in/on almond nutmeat at 0.3 ppm is proposed.

RCB's Comments/Conclusions

RCB will consider the "revised" Section F to actually be supplemental to the original Section F. Thus, iprodione tolerances are proposed for almond nutmeat at 0.3 ppm and almond hulls at 2.0 ppm.

This deficiency (#4) is now considered resolved.

Other Considerations

An International Residue Limit Status sheet is attached to this review. Since there are no established Codex, Canadian, and Mexican limits/tolerances for residues of iprodione in/on almonds, there are no compatibility problems.

Recommendation

TOX and EAB considerations permitting, RCB recommends for the establishment of revised permanent tolerances for combined residues of iprodione (3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide), its isomer (3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide), and its metabolite (3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide) in/on the raw agricultural commodity almond hulls at 2 ppm and almond nutmeat at 0.3 ppm.

Attachment 1: International Residue Limit Status sheet (with all cc's)

cc:R.F., Circu, Reviewer, EAB, EEB, PP#5F3241, PMSD/ISB,
FDA

RDI:JHOnley:8/30/85:RDSchmitt:9/5/85

TS:769:RCB:CM#2:Rm800:X7484:MPFirestone:wh:9/7/85

INTERNATIONAL RESIDUE LIMIT STATUS

1. v. 5/21/85
1. 2/3/85

CHEMICAL: iprodione

PETITION NO.: 5F3241

CCPR NO.: 111

REVIEWER: Michael P. Firestone

Codex Status

No Codex Proposal Step
6 or above

Residue (if Step 9): _____

Crop(s) Limit (mg/kg)

none

Proposed U.S. Tolerances

Residue: iprodione, its isomer
3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-
dioxo-1-imidazolidinecarboxamide and its
metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-
1-imidazolidinecarboxamide

Crop(s) Tol. (ppm)

almond hulls 2
almond nutmeat 0.3

CANADIAN LIMIT

Residue: parent & including metabolites*

Crop(s) Limit (ppm)

none

MEXICAN TOLERANCIA

Residue: _____

Crop(s) Tolerancia (ppm)

none

Notes:

* metabolites - 3-isopropyl-N-(3,5-dichlorophenyl)-2,4-dioxoimidazolidinecarboxamide
- 1-carboxamide and 3-(3,5-dichlorophenyl)-2,4-dioxoimidazolidine-1-carboxamide }