#109801 EAB 5/26/87

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RESIDUE CHEMISTRY BRANCH, HED
PETITION REVIEW QUICK FORM

FROM: Maxie Jo Nelson, Ph.D., Chemist
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mjn

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

TO: Lois Rossi, PM 21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

1. Petition No(s).: 7F3510 [RCB# 2261; MRID#: 400949-00, -01]
2. Chemical(s): Iprodione
3. Tolerance Proposal (RAC's & Levels): strawberries @ 15 ppm
4. Petitioner: Rhône-Poulenc Inc.
5. Tolerance Expression: combined residue of parent + isomer + metabolite, per 40 CFR 180.399(a).
6. Established Tolerances: 40 CFR 180.399(a) - various RACs @ levels of 0.05-150 ppm, including small berries at 15 ppm.
40 CFR 180.399(b) - various commodities of animal origin.
7. Letter(s) of Authorization (if applicable): N/A.
8. Formulation(s): Rovral® Fungicide, EPA Reg. No. 359-685, a 50% wettable powder formulation.
9. Inerts Status: All cleared under 40 CFR 180.1001.

10. Manufacturing Process: Reviewed in conjunction with PP# 8G2087 (memo of A. Rathman, 3/2/79). Impurities in the technical product are not expected to present a residue problem.

11. Proposed Use(s):

HOW TO USE ROVRAL ON STRAWBERRIES

PEST	APPLICATION	RATE	WHEN AND HOW TO USE
Botrytis crown rot (*Botrytis* sp.)	Dip	2.0 lbs/100 gallons	Apply Rovral as a 5 minute pre-plant dip of transplants immediately prior to planting.
Gray mold (*Botrytis cinerea*)	Foliar	1.5 - 2.0 lbs/Acre (0.75-1.0 lb ai/A)	A maximum of 6 foliar sprays may be applied at 10 - 14 day intervals. The first foliar application should occur at no later than 10% bloom. Thorough coverage of the fruit is essential so do not apply Rovral in less than 100 gallons per acre.
			Rovral may be applied up to and including the day of harvest.
			The higher rate and/or shorter spray interval should be used under severe disease conditions.
			Rovral should not be used in an alternating spray program with Ronilan.

12. Plant Metabolism Data on: strawberries and wheat (PP# 8G2087), peaches (PP# 2F2596), lettuce (PP# 3G2801), peanuts (PP# 4G3037), and rice (PP# 6F 3443/FAP# 6H5507).

13. Plant Residues Comprised of: parent compound (RP 26019), its isomer (RP 30228), and its des-isopropyl metabolite (RP 32490). (Predominantly parent)

14. Plant Metabolism Data Translatable Here: #12

15. Nature of Plant Metabolism Data (is) ~~is not~~ adequately defined. The Residue of Concern is: Per #13 and #5.

16. Animal Metabolism Data on: N/A. There are no animal feed items associated with this petition.

17. Animal Residues Comprised of: N/A. See #16.

18. Animal Metabolism Data Applicable Here: N/A. See #16.

19. Nature of Animal Metabolism Data is/is not adequately defined.
The Residue of Concern is: N/A. See #16.

20. Analytical Methods (reference or brief description):
Rhône-Poulenc Analytical Method 151 (EC-GLC). Discussed in R. Cook review of PP# 3F3443, 3/17/87. Similar method MTO'd in re PP# 0E2414 successfully. Method 151 has been submitted (2/87) to FDA for inclusion in PAM, but not yet published. PMSD can supply copy. Limit of detection is 0.05 ppm for each compound measured.

21. Method Validation (crop recoveries): Strawberries
RP 26019 fortified at 1-10 ppm, 72-122% recoveries
RP 30228 " " 0.2-1 " 78-101% "
RP 32490 " " 0.2-1 " 65-96% "

22. Method Validation (control values): Strawberries
RP 26019: ND-0.79 ppm; RP 30228: ND-0.16 ppm; RP 32490: ND-0.11 ppm.

23. Residues Determined by Method: RP 26019, RP 30228, and RP 32490, as separate entities.

24. Enforcement Methodology (is)/is not available. In PAM II. [Additionally, Method 151 has been sent to FDA for inclusion in the PAM II.]

25. Residue Data (crop and maximum residue ~~range~~ (ppm) from Proposed Use):

Crop: strawberries – maximum combined residue = 10.4 ppm (a 1985 CA study of 8 1X treatments (1 lb ai/A), with highest residue found after treatment 6, 0-day PHI.)

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berries sampled 0-days after each treatment
10 field trials (2 include dip) — winter and spring season data
CA, OR, WI, MI, OH, NJ, FL — both ± irrigation
1985 and 1986 — all applications @ 1X max. rate
50–200 gpa H_2O used — 6–17 treatments (foliar ± dip)

Other Comments:
Harvested strawberries were frozen-stored for <1 to >7 months prior to analysis. The stability of iprodione residues under frozen storage for ca 1 year was demonstrated in re PP# 8G2087 (Tab 2, 6/27/79 amendment – peaches and cherries).

26. Residues will not exceed proposed tolerance on (commodities) strawberries

and will exceed proposed tolerance on (commodities) —

27. Livestock Feeding Studies on (species): N/A. See #16.

28. Animal Feeding Levels: N/A. See #16.

29. Animal Residue Ingestion Levels from Proposed Crop Tolerance Levels (proposed tol. level x % in diet): _____ ppm in beef cattle; _____ ppm in dairy cattle/goats; _____ ppm in hogs; _____ ppm in horses; _____ ppm in sheep; _____ ppm in poultry.

N/A

30. Livestock Tolerances are Adequate in (species) _____, but not adequate in _____

N/A

31. Livestock Tolerances Need to be Established: yes/no. If yes (species/levels): N/A. See #16.

32. Other Comments: ① The parent compound accounted for ~90% of the total residue. ② Sample chromatograms and calculations were provided.

33. Other Considerations: ① Iprodione is completely recovered by an FDA multiresidue procedure (III - Luke). ② There is no Registration Standard for iprodione. ③ The geographic representation is adequate.

34. Additional Data Needed:

35. Recommendations: TOX considerations permitting, we recommend for the establishment of the proposed tolerance.

36. Other Comments under Recommendations:

37. Compatability with Codex Tolerances: No; see Attachment. Also ref. 7/1/83 review, K. Arne, PP# 3F2840, Nature of the Residue for docussion why isomer and metabolite should be retained in tolerance expression. [Note: If tolerance were parent only, 10 ppm on strawberries would be adequate.]

Attachment: International Residue Limits Status Sheet.

cc: RF, Circ, Revrewer (min), Thompson (RTP), TOX, EEB, EAB, FDA, PP# 7F3510, PMSD/ISB

Approved: Quick R/IDXl 5/15/87 ; Schmitt [illegible] 5/15/87

INTERNATIONAL RESIDUE LIMIT STATUS

F. Hess 5/14/87

CHEMICAL Iprodione

CODEX NO. 117

CODEX STATUS:

☐ No Codex Proposal Step 6 or above

Residue(if Step 8): iprodione

Crop(s)	Limit (mg/kg)
strawberry	10

PROPOSED U.S. TOLERANCES:

Petition No. 7F3510

RCB Reviewer Nelson

Residue: combined residue per §180.399(a)

Crop(s)	Limit (mg/kg)
Strawberries	15

CANADIAN LIMITS:

☐ No Canadian limit

Residue: Iprodione, including metabolites 3-isopropyl-N-(3,5-dichlorophenyl)-2,4-dioxoimadazolidine-1-carboxamide and 3-(3,5-dichlorophenyl)-2,4-dioxoimadazolidine-1-carboxamide

Crop(s)	Limit (mg/kg)
Strawberries	5

MEXICAN LIMITS:

☒ No Mexican limit

Residue:

Crop(s)	Limit (mg/kg)

NOTES:

Form revised 1986