

US EPA ARCHIVE DOCUMENT

JUL 28 1987

RESIDUE CHEMISTRY BRANCH, HED  
PETITION REVIEW QUICK FORM

FROM: Maxie Jo Nelson, Chemist mjin  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Robert S. Quick, Section Head DM  
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): 7F3542 RCB#: 2568 MRID#: 402440-01
2. Chemical(s): iprodione
3. Tolerance Proposal (RAC's & Levels):  
caneberries (defined in 40 CFR 180.1(h)) @ 25 ppm
4. Petitioner: Rhône-Poulenc Inc.
5. Tolerance Expression: combined residue, expressed as iprodione  
equivalents, as per 40 CFR 180.399(a)
6. Established Tolerances: 40 CFR 180.399:  
(a) various RACs @ 0.05-150 ppm, incl. boysenberries and raspberries @ 15 ppm.  
(b) various commodities of animal origin
7. Letter(s) of Authorization (if applicable): N/A
8. Formulation(s): Rovral<sup>®</sup> Fungicide, EPA Reg. No. 359-685,  
a 50% wettable powder formulation.
9. Inerts Status: Under RD purview

1/6

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 CANBERRIES

Apply Rovral as a foliar spray with ground equipment in sufficient water to obtain thorough coverage at bloom and/or fruit (minimum of 100 gallons) in accordance with the directions in the following table:

DISEASE	Lbs. Product/ Acre	TIMING OF APPLICATIONS
Botrytis fruit rot ( <i>Botrytis cinerea</i> )	1.0 - 2.0	Apply Rovral first at early bloom (5-10% bloom) and make a repeat application again at full bloom. Up to 3 subsequent applications can be applied at 14 day intervals or as required. The final application can be made up to and including the day of harvest.

12. Plant Metabolism Data on: strawberries and wheat (PP# 8G2087),  
peaches (PP# 2F2596), lettuce (PP# 3G2801), peanuts (PP# 4G3037),  
and rice (PP# 6F3443/FAP# 6H5507).
13. Plant Residues Comprised of: parent compound (RP-26019), its  
isomer (RP-30228), and its des-isopropyl metabolite (RP-32490).  
Parent is the predominant residue (>90% on canberries).
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, which is the regulated  
residue (ref. #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.
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18. Animal Metabolism Data Applicable Here: N/A. See #16.
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19. Nature of Animal Metabolism Data is/is not adequately defined.  
The Residue of Concern is: N/A. See #16.
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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 MTD'd in re PP# OE2414 successfully.  
Method 151 has been submitted (2/87) to FDA for inclusion in PAM II,  
but not yet published. In interim, PMSD can supply copy.  
Limit of detection = 0.05 ppm.
21. Method Validation (crop recoveries): Blackberries and raspberries  
RP-26019 fortified at 1-20 ppm, 84-127% recoveries (103% avg)  
RP-30228 " " 0.2-1 " 99-120% " (107% " )  
RP-32490 " " 0.2-1 " 106-123% " (112% " )
22. Method Validation (control values): Blackberries and raspberries  
RP-26019: ND (<0.05 ppm); RP-30228: ND-0.12 ppm; RP-32490: ND.
23. Residues Determined by Method: RP-26019, RP-30228, and  
RP-32490, separately.
24. Enforcement Methodology is ~~is not~~ available. in PAM I and II.  
 [Additionally, Method 151 has been sent to FDA for inclusion in PAM II.] 3

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

MAID  
402440-01

Crop: red raspberries 1.2 - 13.9 ppm  
blackberries\* 6.1 - 22.8 "

6 raspberry trials (OR, WA, MI, OH-1986)

4 blackberry trials (OR-1986)

5 applications/trial (2 @ bloom + 3 biweekly)

2-day PHI; 1X maximum rate (1 lb ai/A) applications

both E irrigation 50-100 gpa spray mix spring/summer applications

\* blackberry trials included marionberries and boysenberries (dewberries)

Other Comments: ① Samples were frozen stored 1-5 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). ② "Caneberries" are adequately represented by these  
field trial data. ③ Other data (of little value) are in PP# 5E3214.

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

Caneberries (25 ppm)

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

4

31. Livestock Tolerances Need to be Established: yes/no. If yes (species/levels): N/A. See #16.
32. Other Comments: ① There is no Iprodione Registration Standard.  
 ② Geographic representation is adequate (Aq. Stat. 1981).  
 ③ Representative chromatograms and calculations were submitted.  
 ④ PP# 5E3214 contains boysenberry and raspberry data to support use in New Zealand.
33. Other Considerations: To support any future tolerance request, the petitioner should be advised that iprodione, its isomer, and metabolite (per §180.399(a)) will each need to be tested through all 4 of the FDA multiresidue procedures for which recovery data are
- ~~34. Additional Data Needed: not presently available. (see PAM I, Appendix II). [Ref. 40 CFR 180.158(h)(15) and FR, Vol. 51, p. 34249, 9/26/86 and memo from J. Corneliusen, FDA, 6/9/87.]~~  
Note: partial data are available for iprodione and its isomer.
35. Recommendations: TOX considerations permitting, we recommend in favor of the establishment of the proposed tolerance: caneberries @ 25 ppm.
36. Other Comments under Recommendations: ① Advise the petitioner re #33. ② If/when this caneberry tolerance is established, the separate commodity listings for boysenberries and raspberries need to be deleted from 40 CFR 180.399(a).
37. Compatibility with Codex Tolerances: No. See Attachment.  
 [Also ref. 7/1/83 review, K. Arne, PP# 3F2840, Nature of the Residue, for discussion why isomer and metabolite should be retained in the tolerance expression.]

Attachment: International Residue Limits Status Sheet

cc: RF, Circ, Reviewer, TOX, PMSD/ISB, PP# 7F3542, FDA.

Approved: Quick R/E RWR 7/27/87; Schmitt R D# 7/27/87

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INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Iprodione

CODEX NO. III

*1/22/87*

CODEX STATUS:

No Codex Proposal  
Step 6 or above

PROPOSED U.S. TOLERANCES:

Petition No. 7F3542

RCB Reviewer Nelson

Residue: combined residue  
per 40 CFR 180.399(a)

Residue(if Step 8): \_\_\_\_\_

Iprodione only

Crop(s)                      Limit (mg/kg)

Raspberries, red, black      5

Crop(s)                      Limit (mg/kg)

Caneberries                      25

CANADIAN LIMITS:

No Canadian limit (on caneberries)

Residue: \_\_\_\_\_

\_\_\_\_\_  
Crop(s)                      Limit (mg/kg)

MEXICAN LIMITS:

No Mexican limit

Residue: \_\_\_\_\_

\_\_\_\_\_  
Crop(s)                      Limit (mg/kg)

NOTES:

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