9-3-87

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

SEP 3 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP #4F3150 RCB #2687 Iprodione on Dry, Snap, and Lima Beans. Amendment of 1/16/87. No Accession No.

FROM: Cynthia Deyrup, Ph.D., Chemist
Tolerance Petition Section 2
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: John H. Onley, Ph.D., Section Head
Tolerance Petition Section 2
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Lois Rossi, PM # 21
Fungicide-Herbicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Background

In the amendment of 7/30/86, Rhone-Poulenc proposed the establishment of permanent tolerances for combined residues of the fungicide 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 (also designated RP-30228), and its des-isopropyl metabolite, 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide (also designated RP-32490) in/on the following raw agricultural commodities:

Beans, succulent	2.0 ppm
Beans, dry	2.0 ppm
Bean forage	90.0 ppm
Bean hay	90.0 ppm

1/4

Recommendations

RCB recommends that the following permanent tolerances for residues of iprodione, its isomer, and its des-isopropyl metabolite be established:

Beans, succulent	2.0 ppm
Beans, dry	2.0 ppm
Bean forage	90.0 ppm
Beans, dried, vine hay	90.0 ppm

Present Consideration

The present amendment consists of a revised Section B/label and a revised Section F. The remaining deficiencies will be cited below, following the numbering used in RCB's memo of 2/15/85 (PP #4F3150, memo of C. Deyrup).

The outstanding deficiencies, Deficiencies 1b, 4a, 4b, and 4e are all related to the need for a revised Section B/label and a revised Section F.

Deficiency 1b (RCB's Comments/Conclusions, memo of 12/1/86)

The petitioner needs to submit a revised Section B/label which contains a restriction against the feeding of succulent bean hay to livestock (instead of the current restriction against the feeding of snap bean hay) and a revised Section F in which the commodity "Bean hay" is changed to "Beans, dried, vine hay" or additional residue data on succulent bean hay.

Petitioner's Response

The petitioner has submitted a revised Section B/label with the following feeding restrictions: "Do not allow foraging for 14 days after last application of Rovral. Do not feed snap bean hay to livestock. Do not feed dry bean hay to livestock until 45 days after last application. Do not feed succulent bean hay to livestock.

The revised Section F submitted with this amendment proposes the following tolerances:

Beans, succulent	2.0 ppm
Beans, dry	2.0 ppm
Bean forage	90.0 ppm
Beans, dried, vine hay	90.0 ppm

RCB's Comments/Conclusions

The revised Section B/label and revised Section F adequately resolve the remaining deficiencies.

Other Considerations

Codex has established a MRL (maximum residue limit) of 0.2 ppm iprodione per se on dry beans; this residue limit is not compatible with the proposed 2 ppm US tolerance. Canada has established an MRL of 0.1 ppm (presumably parent) on white beans. There is no Mexican tolerance for residues of iprodione on snap beans, dry beans, bean forage, or hay.

Attachment-International Residue Limit Status
cc: R.F.., Circu, C. Deyrup, TOX, PP #4F3150, PMSD/ISB, PM 21
RDI: JHOnley:8/31/87:RDSchmitt:8/31/87
TS-769:CD:cd:8/31/86:RM810:CM-2:X7484

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Iprodione

CODEX NO. 111

confirmed J. Lewis 3/31/87

CODEX STATUS:

☐ No Codex Proposal Step 6 or above

Residue(if Step 8): iprodione

Crop(s)	Limit (mg/kg)
Beans (dry)	0.2

PROPOSED U.S. TOLERANCES:

Petition No. PP4F 3150

RCB Reviewer Dexrup

Residue: iprodione, 3-(1-methylethyl)-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide, 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidine carboxamide

Crop(s)	Limit (mg/kg)
Beans, succulent	2.0
Beans, dry	2.0
Bean forage	90.0
Beans, dried, vine hay	90.0

CANADIAN LIMITS:

☐ No Canadian limit

Residue: iprodione and its Metabolites 3-Isopropyl-N'-(3,5-dichlorophenyl)-2,4-dioxoimidazoline-1-carboxamide and 3-(3,5-dichlorophenyl)-2,4-dioxoimidazolidine-1-carboxamide

Crop(s)	Limit (mg/kg)
Beans	0.3
White beans	0.1 *

MEXICAN LIMITS:

☑ No Mexican limit

Residue: _____

Crop(s)	Limit (mg/kg)

(4)

NOTES: * Negligible residue type limit (parent only).

Form revised 19