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

CASWELL FILE

JAN 23 1991

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Iprodione 6 (a)(2) Data--Skin Rash for Strawberry Pickers When Plants are Dip Treated.

TO: James Stone/Susan Lewis PM 21
Registration Division (H7505C)

FROM: K. Clark Swentzel *K. Clark Swentzel 1/17/91*
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EPA ID No. 000264-00452
Barcode: D159823
Submission: S388239
HED Project No. 1-0412
Caswell No. 470A
Registrant: Rhone Poulenc

Requested action

none

Submission

The registrant, based on their interpretation of Section 6(a)(2) of FIFRA, has reported two incidents involving strawberry workers in California who developed skin rash on their hands and arms after picking strawberries from plants treated with Rovral (50.0% Iprodione). The total proportion of workers affected was not reported, however, the submission indicated that 5 of 20 workers in the second incident had a skin rash. Apparently dip treatment was used on the strawberry plants prior to both incidents. According to CDFA, a correlation was established between the use of Rovral for dip treatment and the workers' skin irritation.

The cover letter stated that "Rhone Poulenc will shortly be submitting label modifications to the Agency that will address this skin rash problem, especially during the dip treatment where wet plants are handled."

Response

It is this reviewer's opinion that the reported incidents of skin irritation could be associated with exposure to Rovral since it has been demonstrated that a formulation containing 50% Iprodione induced primary skin irritation in rabbits (Study no. 5170, MRID no. 232709). It is TB II's opinion that the registrant's proposed label should clearly indicate that the skin of workers should not be exposed to plants which are wet from treatment.

The Registration Division should also request comments from the Occupational and Residential Exposure Branch on the proposed label (based on a conversation with Al Nielsen, OREB).