6-8-88

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

JUN 8 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#7G3525. Rovral on stored corn grain. Revised Sections B and G. No MRID No. RCB No. 3535.

FROM: Linda S. Propst, Chemist
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Hazard Evaluation Division (TS-769)

THRU: Andrew R. Rathman, Section Head
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TO: Lois Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

Background

Rhone-Poulenc Inc. previously requested a temporary tolerance for combined residues of the fungicide iprodione [3-(3,5-dichlorophenyl)-N-(methyl-ethyl)-2,4-dioxo-1-imidazolidine-carboximide], its isomer [3-(1-methylethyl)-N-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboximide] expressed as iprodione equivalents, in or on field corn grain at 20 ppm.

RCB recommended against the proposed 20 ppm tolerance (See L. Propst memo dated 9/29/87) for the following reasons:

> The proposed tolerance would not be adequate to cover all residues of iprodione which may occur on corn grain which has been treated at the maximum recommended application rate.
>
> The existing tolerances would not be adequate to cover all secondary residues of iprodione which may occur in eggs and the fat, kidney, and liver of poultry ingesting corn grain treated as proposed.

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Present Consideration

The petitioner has submitted revised Sections B and G.

Previously, the proposed use would allow for a single application of Rovral 50 WP to be applied at dosage rates of 4-8 oz. of product (2-4 oz. ai.) per 100 bushels of corn using 300-400 ounces of water (40 ppm on a calculated basis).

The currently proposed use would allow for a single application using 3.6 fl. oz. of Rovral 4F (1.8 oz. a.i.) or 4 oz. of Rovral 50 WP (2 oz. a.i.) per 100 bushels (20 ppm on a calculated basis) of corn in a maximum of 300 ounces of water.

The revised EUP would involve 215 lbs active [179.2 lbs. ai + 35.8 lbs. a.i. (20% extra)] to treat a maximum of 160,000 bushels of corn grain.

Conclusions

1. Since the maximum recommended application rate is currently half of that previously proposed for Rovral on corn grain, RCB can now conclude that a 20 ppm tolerance will be adequate to cover all residues of iprodione which may occur on corn grain treated as proposed.

2. The existing tolerances will be adequate to cover all secondary residues of iprodione which may occur in eggs and the fat, kidney, and liver of poultry which may occur as secondary residues as a result of poultry ingesting corn grain bearing residues of 20 ppm.

Recommendations

Toxicological considerations permitting, RCB can now recommend for the proposed EUP and the temporary tolerance of 20 ppm to cover residues of iprodione which may occur in or on corn grain as a result of the proposed use.

While we are unable to list all the requirements for a future permanent tolerance at this time, the petitioner should be informed that the following will be needed:

1. Data on iprodione residue levels in the grain dust that is generated when treated corn is moved through grain transport and storage facilities.

2. A revised Section B/label which adequately addresses the problem of possible over-tolerance residues arising from multiple treatment of grain by different personnel.

cc: Propst, TAS, PP#7G3525, E. Eldredge (ISB/PMSD), Circulation Reading File
RDI: A. R. Rathman, 6/8/88; R. D. Schmitt, 6/8/88
TS-769:RCB:LSP:lsp:CM-2:Rm803C:557-7324:6/8/88