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

MAY 5 1991

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 91-FL-15. §18 Crisis Exemption. Iprodione on Tobacco. No MRID #. CB # 8129. DP Barcode: D165090.

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On May 24, 1991, the Florida Department of Agriculture & Consumer Services declared a crisis exemption for the use of iprodione (Rovral 4F or Rovral 50WP, EPA Reg # 264-453 and 264-482) on tobacco grown in northern Florida in order to control Rhizoctonia-induced diseases. The active ingredient is 3-(3,5-dichlorophenyl)-N-(1-methylethyl)-2,4-dioxo-1-imidazolidine-carboxamide.

The exemption use calls for ground applications at 0.5 lb ai/A/treatment to seedbed and tobacco plants in the field. Application should begin when symptoms of the disease first appear in the seedbed and be repeated at 7-14 days if conditions are favorable for disease development. Field application should be made when leaf spots appear. Two seedbed and one field application would be allowed between January and June. A 7-day pre-harvest interval is indicated.

CBRS previously raised no objection to a crisis exemption from North Carolina (NC-91-08; 5/31/91) for the same chemical use on tobacco. One notable difference is that NC-91-08 is confined to

use on commercial seedbeds and greenhouse transplants and does not permit use in the field. In the 5/31/91 memo, CBRS concluded that total residues on tobacco would not exceed 0.1 ppm with a 60-day PHI.

Tolerances are established for residues of iprodione, its isomer N-(3,5-dichlorophenyl)-3-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide (RP30228), and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide (RP32490) in or on various fruits and vegetables ranging from 0.1 to 60 ppm, and 90 to 150 ppm in forage and hay. Tolerances on meat, milk, poultry and eggs are established at 0.5-3.0 ppm [40 CFR 180.399].

A Registration Standard has not been completed for iprodione. Use on tobacco is not permitted on the current labels.

For the purpose of this Section 18, the residues of concern on tobacco are iprodione, its isomer N-(3,5-dichlorophenyl)-3-(1-methylethyl)-2,4-dioxo-1-imidazolidinecarboxamide (RP30228), and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidine-carboxamide (RP32490).

No iprodione residue data were submitted for tobacco in the current or any previous submission. CBRS will estimate total iprodione residues on tobacco based on leaf lettuce data.

Residues of parent, RP30228 and RP32490 on leaf lettuce, following 3 x 1.0 lb ai/A applications, were 37.18 ppm (0-day PHI), 1.58 ppm (7 day), 0.52 ppm (16 day), 0.66-0.83 ppm (21 day), and 1.37 ppm (22 day). (PP#3G2801, N. Dodd, 4/11/83).

As indicated in the 5/31/91 memo, residues resulting from tobacco seedbed treatments are minimal due to the low percent of treated leaves harvested and substantial growth dilution. On this basis, CBRS estimates that total iprodione residues are not likely to exceed 0.5 ppm on green and cured/dried tobacco if a pre-harvest interval of 7 days is included on the 91-FL-15 label.

There are no feed items associated with tobacco. Therefore, there will be no problem with secondary residues in meat, milk, poultry and eggs.

CONCLUSIONS AND RECOMMENDATION

1. For the purpose of this Section 18, the residues of concern on tobacco are iprodione, its isomer N-(3,5-dichlorophenyl)-3-(1-methylethyl)-2,4-dioxo-1-imidazolidine-carboxamide (RP30228), and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidine-carboxamide (RP32490).

2. Method I as described in PAM II may be used for

enforcement.

3. Provided a 7-day PHI is imposed on the label, combined residues of iprodione, its isomer N-(3,5-dichlorophenyl)-3-(1-methylethyl)-2,4-dioxo-1-imidazolidine-carboxamide (RP30228), and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidine-carboxamide (RP32490) on green and cured tobacco are not likely to exceed 0.5 ppm.

4. There will be no problem with transfer of residues to meat, milk, poultry and eggs from this proposed use.

5. Analytical reference standards are available at the Pesticides and Industrial Chemicals Repository, RTP, NC.

6. Residue data used to estimate iprodione residues in/on green and cured tobacco were not produced by Craven Labs.

TOX considerations permitting and provided a 7-day PHI is imposed, CBRS has no objection to this Section 18 request. An agreement should be made with the FDA in regard to treated commodities in commerce.

Note to PM: No pyrolysis study is available. Such a study is required for the establishment of a permanent tolerance if residues in tobacco exceed 0.1 ppm. TOX should be made aware of this fact. For any future §18 exemption request for iprodione on tobacco, a pyrolysis study may be required.

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