

US EPA ARCHIVE DOCUMENT



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

Head 10-4-94
95

OCT 4 1991

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Iprodione. Labels for Iprodione use on Kiwifruit in New Zealand.
No MRID # DP Barcode D206574 CBRS #14222

FROM: Steven A. Knizner, Chemist *St. A. Knizner*
Chemistry Pilot Review Team
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

THRU: Edward Zager, Chief *Edward Zager*
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

TO: Bill Wooge, PM Team 52
Special Review and Reregistration Division (7508W)

In a letter to the Agency dated 7/15/94, Rhone-Poulenc supplied labels for Rovral Flo and Rovral WP which allow use on kiwifruit in New Zealand. These labels were requested in previous CBRS reviews of iprodione use on kiwifruit in New Zealand (S. Funk, CBRS #9165, 6/9/92 and B. Cropp-Kohlligian, CBRS #10807, 6/27/94).

Background

Tolerances have been established for the 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, and its metabolite 3-(3,5-dichlorophenyl)-2,4-dioxo-1-imidazolidinecarboxamide in/on a number of raw agricultural commodities (RACs), including an import tolerance of 10.0 ppm in/on kiwifruit [40 §CFR 180.399].

The CBRS review dated 6/27/94 concluded "If, upon receipt of acceptable iprodione product labels, CBRS determines that the subject data adequately reflect representative formulations and the maximum use of iprodione on kiwifruit allowed in New Zealand, then the currently established import tolerance of 10.0 ppm for iprodione residues of concern in/on kiwifruit would be appropriate."



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

Labels

The label supplied for Rovral Flo, containing 250 g/L iprodione, under "Instructions for Field Use" states, "Rates recommended below are for high volume spraying to the point of run off. Rates should be increased for concentrate spraying. Do not use less than 150 mL Rovral Flo/100 litres (3 litres/hectare)." For control of Botrytis and Sclerotinia Fruit Rots on kiwifruit, the recommended rate is 150 mL/100 litres, with a one day PHI, and up to 3 applications per season.

The label supplied for Rovral WP, containing 500 g/kg iprodione, under "Instructions for Use, Field Crops" states, "Rates recommended below are for high volume spraying to the point of run off. Rates should be increased for concentrate spraying. Do not use less than 75 g Rovral/100 litres." For control of Botrytis and Sclerotinia Fruit Rots on kiwifruit, the recommended rate is 75 g/100 litres, with a one day PHI, and up to 3 applications per season.

CBRS Response

Both labels recommend preparing spray solutions at a minimum rate of 37.5 g ai/100 litres spray mix. However, only the Rovral Flo label provides a recommended amount of material to be applied per a specified area (that is, 3 litres of Rovral Flo/hectare). The 3 litres Rovral Flo/hectare corresponds to the application rate used in the previously reviewed field trials, namely 3 applications of iprodione at 0.688 lb ai/A/application (or 0.75 kg ai/ha/application). The Rovral WP label should be modified to clearly state that the maximum application rate for iprodione on kiwifruit is 0.688 lb ai/A/application (or 0.75 kg ai/ha/application rate).

For both labels, the recommended rate for kiwifruit corresponds to the minimum rate to be used for all crops on the label. The wording of the label should be revised to indicate that the recommended rate for kiwifruit represents the maximum allowable application rate.

If label revisions are not made to more clearly describe that the maximum iprodione application rate for kiwifruit is 0.688 lb ai/A/application (or 0.75 kg ai/ha/application), over tolerance residues in/on kiwifruit may result.

cc: S.F., circ., R.F., List B File, S.Knizner
RDI: W. Smith 9/26/94, B. Cropp-kohlligian 9/26/94, L Edwards 9/26/94, M.Metzger, 9/28/94 E.Zager, 9/29/94
7509C:CBRS:CM#2:305-6903:SAK:ak:Iprodion:9/19/94