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Head

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MEMORANDUM

**SUBJECT:** Iprodione. Waivers for Crop Field Trials: Aerial Application on Almonds, Dry Beans, Dry Bulb Onions, and Grapes; and Chemigation Application for Almonds. No MRID # DP Barcode D207150 CBRS #14300

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

**THRU:** Edward Zager, Chief  
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 iprodione end use product labels with aerial application to almonds, dry beans, and dry onion bulbs [Rovral 50 SP (EPA Reg. No. 264-432), Rovral WG (EPA Reg. No. 264-524), Rovral 4 Flowable (EPA Reg. No. 264-482), and Rovral (EPA Reg. No. 264-453)]. Rhone-Poulenc noted that for grapes aerial application is not permitted, nor is chemigation application for almonds.

Based on the provided labels, the registrant requested waivers for conducting crop field trials reflecting aerial application for almonds, dry beans, dry onion bulbs and grapes. Additionally, the registrant also requested a waiver for conducting crop field trials for chemigation application to almonds.

Background

The Greybeard Committee previously reviewed the waiver requests discussed above and concluded in a memo dated 8/23/94 that the data required for aerial application may be waived in light of PR Notice 93-2 provided that the specific requirements of this Notice regarding gallage per acre, adequate ground data, diluents other than water, etc., are fulfilled and reflected in iprodione labels. The Greybeard Committee also waived the requirements for aerial application data for grapes on the condition that iprodione labels were



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supplied showing this type of application is not permitted for grapes. Similarly, the Greybeard Committee waived data requirements for chemigation application data for almonds provided labels were supplied that indicated this type of application is not permitted on almonds.

PR Notice 93-2 sets forth the following policy, "Provided that the pesticide product label specifies that aerial applications are to be made in a minimum of 2 gallons water per acre (or 10 gallons per acre in the case of tree or orchard crops), crop field trials reflecting aerial application will be waived in those cases where adequate data are available from use of ground equipment reflecting the same application rate, number of applications, and preharvest interval. This data waiver does not apply to aerial applications using diluents other than water (e.g., vegetable oils). In addition, the Agency reserves the right to require aerial data if special circumstances warrant it."

### Recommendations

The provided product labels [Rovral 50 SP (EPA Reg. No. 264-432), Rovral WG (EPA Reg. No. 264-524), Rovral 4 Flowable (EPA Reg. No. 264-482), and Rovral (EPA Reg. No. 264-453)] meet the conditions set forth in PR Notice 93-2. For aerial application of iprodione to dry beans, and dry bulb onions, the various products must be diluted in a minimum of 10 gallons of water, and for almonds, 15 gallons of water. Therefore, the requirement for crop field trials reflecting aerial application of iprodione on almonds, dry beans, and dry bulb onions is waived.

Furthermore, none of the supplied product labels permit iprodione chemigation application to almonds or aerial applications to grapes; therefore, the requirement for crop field trials for these crop/application methods is waived.

cc: S.F., circ., R.F., List B File, S.Knizner

RDI: W. Smith 9/26/94, B. Cropp-Kohlligian 9/26/94, T.Edwards 9/26/94, M.Metzger, 9/28/94 E.Zager, 9/29/94  
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