DATE: April 14, 1981

SUBJECT: Chevron Captan Technical 90%
EPA Registration No. 239-2351

FROM: Sherell A. Sterling
FHB/TSS

TO: Henry Jacoby
Product Manager (21)

Registrant: Chevron Chemical Co.
Ortho Agricultural Chemicals Div.
940 Hensley St.
Richmond, CA 94804

Active Ingredients:
Captan . . . . . . . . . . 85.1%
Related derivatives . . . . 4.9%
Inert Ingredients . . . . . . 10.0%

Background: Eye irritation data were submitted to substantiate a change in
signal word. The latest accepted label had the signal word CAUTION on it; the
current revision is to DANGER.

Data submitted were on Captan Technical and conducted at the Standard Oil of
California Laboratories in Richmond, CA. The method of support is "cite all."

Recommendations:
1. The Eye Irritation study is considered adequate and acceptable for
   conditional registration purposes. However, this study should have run for 21
days instead of just 14 days.

2. Based on the Eye Irritation study the correct signal word is DANGER, as
   proposed by the registrant. Please note that if the test were run for 21
days, the product might be shown to be in toxicity category II.

Labeling Recommendations:
1. Please revise the "Hazards to Humans and Domestic Animals" section as
   follows:

   DANGER, Corrosive, causes irreversible eye damage. Harmful if swallowed
   or inhaled. May cause allergic skin reactions. Do not get in eyes or on
   clothing. Wear respirator, goggles and gloves. Wash thoroughly with soap
   and water after handling. Remove contaminated clothing and wash before
   reuse.
2. The "Environmental Hazards" section must include the following information:

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

3. Under the "Storage and Disposal" heading, the following sections must be revised:

"PESTICIDE DISPOSAL: Pesticide spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act."

"CONTAINER DISPOSAL: Dispose of bags according to approved Federal, State or local procedures under the Resource Conservation and Recovery Act."

Also, delete the "GENERAL" statement.

Review:
1. The Eye Irritation Potential of Captan Technical; Standard Oil of CA & 1459/39:26; July 27, 1979; Acc. No. 244716

Procedure: Nine New Zealand white rabbits each received 100 mg of Captan Technical in one eye. In three rabbits, the eye was rinsed for 1 minute with approximately 80 ml of distilled water 30 seconds post-treatment. Draize scoring at 1,2,3,4,7,10,14 days.

Results: At 24 hours in the un-rinsed eyes, corneal opacity in 3/6=10 1/6=15; iris irritation in 4/6=5; redness in 6/6=3; chemosis in 3/6=1, 2/6=2, 1/6=3; discharge in 6/6=3. At 7 days corneal opacity observed in 1/6=5, 1/6=40, 1/6=60; redness in 3/6=1, 2/6=3; chemosis in 2/6=1; discharge in 3/6=1, 2/6=3; pannus in 3/6 eyes. By 14 days, corneal opacity still exhibited in 1/6=10, 1/6=80; redness in 1/6=1; discharge in 1/6=1; pannus observed in 2/6 eyes.

The rinsed eyes at 24 hours showed no corneal opacity; iris irritation in 2/3=5; redness in 3/3=6; chemosis in 2/3=1, 1/3=3; discharge in 1/3=1, 2/3=3; 1/6 exhibited white necrosis. At 7 days, corneal opacity seen in 1/3=20; redness in 1/3=1, 1/3=2; discharge in 1/3=1; pannus in 2/3. At 14 days, opacity still visible in 1/3=15 and pannus in 1/3.

Study Classification: Core minimum Data, Test should have been run for at least 21 days.

Toxicity Category: I - DANGER. Category decided on 14 day data rather than 21 days.