To: Jacoby  
Product Manager 21  
Registration Division (TS-767)

From: Samuel Creeger, Chief  
Review Section No. 1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769)

Attached please find the environmental fate review of:

Reg./File No: 239-1246 239-2351

Chemical: Captan

Type Product: Fungicide

Product Name: Orthocide

Company Name: Chevron

Submission Purpose: label amendment

ZBB Code: other  
ACTION CODE: 450-400

Date in: 10/11/83  
EFB #: 4007-08

Date completed: 1/4/84  
Tais (level II) Days

63/64  2.50

Deferrals To:

Ecological Effects Branch
Residue Chemistry Branch
Toxicology Branch
1.0 INTRODUCTION

Chevron Chemical Company has submitted an application and data in support of a label amendment for ORTHOCIDE 65 Seed Protectant and product chemistry data to support four alternate formulas.

A list of data citations which have been submitted by Chevron to the agency to satisfy data requirements and open literature citations which are deemed by Chevron to satisfy data requirements also accompanies the submission.

2.0 CHEMICAL STRUCTURE AND PROPOSED LABEL

Chemical Structure:

See the attached proposed label.

3.0 DISCUSSION OF DATA


This study has been previously reviewed (3/24/80 and 2/21/80) and found to be acceptable for seed treatment only.

3.2 Environmental Fate Data Requirements 158.130. Data citations for Captan. Chevron Chemical Company. September 28, 1983.

As far as can be determined from the EAB files, the open literature citations were never submitted for review except by reference and the Chevron company studies were reviewed. The only study which has been accepted to date as satisfying any EAB data requirement is the one which accompanies this submission and is reviewed in 3.1 above.

4.0 CONCLUSIONS

Although captan has registered uses, a review of the EAB files shows that the only data requirement which has been completely satisfied is anaerobic soil metabolism (satisfied for seed treatment only). There are numerous references in the files to open literature citations, but none of these have been submitted to the EAB for review. An hydrolysis study was rejected in our review of 11/22/77 because only a summary of the cited paper was submitted without any methodologies, material balances or mathematical calculations. An aerobic soil metabolism study was reviewed on 1/10/75 and found to be deficient because there was not an accounting for the ring portion of the molecule.
Even though a seed treatment is not a food use, the minimum EAB data requirements are a hydrolysis study and an aerobic soil metabolism study. It is not clear from the submission if this amendment is for new uses of captan or if it is for minor technical or administrative changes. In any case, EAB cannot concur with further uses of captan until these minimal data requirements are met.

Norma Kay Whetzel
January 4, 1984
Review Section No. 1
Environmental Fate Branch
Hazard Evaluation Division
Page ____ is not included in this copy.

Pages __4__ through __7__ are not included in this copy.

The material not included contains the following type of information:

____ Identity of product inert ingredients.
____ Identity of product inert impurities.
____ Description of the product manufacturing process.
____ Description of product quality control procedures.
____ Identity of the source of product ingredients.
____ Sales or other commercial/financial information.
____ A draft product label.
____ The product confidential statement of formula.
____ Information about a pending registration action
____ FIFRA registration data.
____ The document is a duplicate of page(s) _______
____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.