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

APR 27 1987

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA No. (11678-1): Captan Technical: Additional Product Chemistry Data for Makhteshim Material in Response to Registration Standard. MRID Nos. 400217-01, 400660-01; RCB No. 2120

FROM: J. Garbus, Chemist *SG*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Andrew Rathman, Section Head *ARR*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: R. Mountfort / E. Wilson, PM-23
Registration Division (TS-767)

Makhteshim-Agan (America) Inc., New York, NY has submitted additional product chemistry for its captan technical as required by the Captan Registration Standard issued 3/10/86. The studies address the description of the manufacturing process and starting materials (§61-2 of 158.120) and the discussion of the formation of impurities (§61-3 of 158.120).

Makhteshim has now submitted the names of the suppliers of the starting materials used in its production of captan, technical specifications of the materials, and analytical methods for the purity of the materials. In response to the requirement of §61-3, Makhteshim has resubmitted the discussion of the potential formation of impurities that has been supplied by the Captan Task Force composed of Chevron, Stauffer, and Makhteshim.

Makhteshim states that all other product chemistry data for its captan were submitted by the Captan Task Force. RCB reviewed the submission of the Task force (J. Garbus, memo, 4/2/87) and concluded that Makhteshim independently needed to provide a description of its manufacturing process. Makhteshim has not done so and considers that the description in the Task Force combined submission is sufficient.

Makhteshim will have to supply a description of the manufacturing process that it employs to produce its captan. Although the overall procedure may be similar to those described for the other member of the Task Force, the list of starting materials used by Makhteshim differs from the others and therefore its procedure must differ in detail.

We conclude that Makhteshim can not cite the description in the task force submission but must provide a description of the process it uses.

In our review of the combined submission, we concluded that the requirements of physical/chemical characteristics (§§ 63-2 thru 63-21) have been met only for the Stauffer product.

We will require data for the physical/ chemical characteristics of technical grade captan made by Makhteshim. Data are needed for melting point, density, solubility, pH, and stability.

We also required that each producer submit a Confidential Statement of Formulation for their individual product. Makhteshim has submitted a CSF that is identical to that submitted by Chevron. When all of the information that has been requested in this review and in our previous review, (J. Garbus, memo, 4/2/87 RCB Nos. 2018-2020), has been submitted, we will then be able to more completely assess the similarities and differences in these products. At that time we anticipate deferring to TOX for their comments.

Conclusions and Recommendations

1. Makhteshim has provided the names of the suppliers of the starting materials it uses in its production of captan and the technical specifications of the beginning reactants.
2. Makhteshim has not supplied a description of the process that it uses in producing captan nor has it indicated how its process is similar to or differs from the procedures for the manufacture of captan that have been submitted. Makhteshim will need to do so.
3. Makhteshim will need to submit data for the physical/chemical characteristics of its captan. Data are needed for melting point, density, solubility, pH, and stability.

cc: Circ., R. F., S.F., Reviewer, PMSD/ISB
RDI:ARR:4/23/87:RDS:4/24/87
TS-769:JG:jg:RM:810:CM#2:4/24/87