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

AUG 18 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: NRDC Comments on Captan PD 2/3

FROM: Nan S. Gray, Chemist
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THRU: Andrew R. Rathman, Section Head
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TO: Jack Housenger, Section Head
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RCB makes the following comments on issues pertaining to this branch which were raised by the NRDC on the Captan Special Review Position Document 2/3.

On page 2, NRDC states that "the captan metabolite THPI is inadequately discussed in the PD 2/3". RCB agrees that THPI was not adequately discussed in the earlier document, primarily because a complete data set was not available at that time. Additional data have been received since PD 2/3 was drafted and this information will be included in the PD 4 now being prepared.

Further concern over THPI is expressed on page 9 where NRDC comments that PD 2/3 does not specify what type of residue data will be required to conduct a risk assessment on THPI, nor does it set a deadline for submission of such data. NRDC also expresses interest in whether the Agency will attempt to determine the conversion of captan to THPI that could occur through (among a list of possibilities) cooking or commercial food processing. The Agency has requested (Data Call-in Notice on Captan and its Metabolites, April 29, 1985) and received data on residue levels of both captan and THPI in a number of raw agricultural commodities, and in the same commodities following the washing, peeling, and processing steps. Data have also been received on both captan and THPI residue levels resulting from pre-plant, at-plant, pre-harvest, and post-harvest use of captan. All of this information will be used in the preparation of the PD 4.

On pages 10 and 11, NRDC expresses concern about the adequacy of FDA's routine multiresidue analysis to detect the presence of captan. As part of its special review work on

captan, RCB requested and received from FDA compilations of its captan monitoring data from FY '78 - '84. According to FDA, samples were analyzed by PAM Method 232.4 with a reported recovery of 80% for captan. The estimated limit of quantitation is 0.02 ppm. Overall the data show that captan residues are well within the established tolerances. These FDA monitoring data were used in the dietary exposure assessment, and will be included in PD 4.

cc: Tina Levine, circ(7), R.F., S.F., PMSD/ISB, Gray

RDI: A.R. Rathman 8/16/88 R.D. Schmitt

TS-769C: RCB: NSG: CM-2: Rm 810F: 557-7378: 8/18/88