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

RF

JUN 16 1989

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 4-122. Bonide Complete Fruit Tree Spray  
containing Captan. DEB No. 4870.

FROM: Linda S. Propst, Chemist *Linda S Propst*  
Dietary Exposure Branch  
Health Effects Division (H7509C)

THRU: Richard D. Schmitt, Ph.D., Acting Chief  
Dietary Exposure Branch  
Health Effects Division (H7509C) *Richard D Schmitt*

TO: Eugene Wilson, Team 23  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Bonide Chemical Co., Inc. has submitted a revised label for Bonide Complete Fruit Tree Spray (EPA Reg. No. 4-122) to bring this Captan formulation into compliance with tolerance levels and use patterns for Flowable Concentrates containing Captan. The registrant claims that their product is neither a flowable formulation nor a true emulsifiable concentrate but rather a wettable powder.

Registration Division has asked DEB to comment on whether residue data from Captan wettable powders can be applied to this formulation. Although not directly stated it appears that the company believes their product would behave in a manner similar to a flowable formulation. No submission of data other than the Confidential Statement of Formula has been made.

DEB's Comments and Recommendations

DEB will need some data to indicating that this formulation behaves like a wettable powder before residue data from the wettable powders can be translated to this product.

Dietary Exposure Branch suggests that the best way to prove that the formulation behaves as a wettable powder is to conduct residue trials, side by side, on a few representative crops. Comparable residue levels resulting from the wettable powder and

this emulsifiable concentrate would be acceptable. While there may be other ways to prove that the the formulations produce similar residue levels, we would encourage the registrant to discuss these with Dietary Exposure Branch before any studies are initiated.

cc: Reading File, Subject File, Circulation, Reviewer, Branch  
Chief, PMSD/ISB

RDI: A. R. Rathman, 6/14/89: E. Zager, 6/15/89

H7509C:DEB:LSP:lsp:CM-2:Rm803C:557-7324,6/15/89