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

DEC 18 1989

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: Captan on Taro. IR-4 Request for Data Waiver.
No Accession / No MRID No. DEB# 6055

From: Jane S. Smith, Chemist *(Signature)*
Special Registration Section I
Dietary Exposure Branch
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Thru: Andrew Rathman, Section Head *(Signature)*
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To: Eugene Wilson PM Team 23
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Registration Division (H-7505C)

Introduction

Interregional Research Project No. 4 (IR-4) has requested a waiver for the reregistration requirement for additional residue data for captan and the residue of concern, tetrahydrophthalimide (THPI), on whole taro roots. IR-4 has submitted supporting information for the waiver.

Conclusions and Recommendations

Keeping in mind this issue involves less than 400 acres of wetlands in Hawaii where residue trials show no captan residues in the taro root, peel, or leaves, DEB agrees that residues of captan and THPI are not likely to occur in the whole taro root. Therefore, the requirements for additional data regarding residue on whole taro root should be waived.

Detailed Considerations

Data on taro root, peel, and leaves (PP#2E1215 and PP#7E1982) have been reviewed and summarized in the Residue Chemistry Chapter of the Registration Standard (dated 8/15/85). According to the Registration Standard the data submitted in connection with PP#2E1215 showed no residues (<0.1 ppm) in/on taro peel and root, separately. These data were considered inadequate since the residues represented taro peel and root separately rather

than the whole root. It is noted in the registration standard that "Dr. Wong, University of Hawaii, indicated via telephone conversation (7/29/85) that fresh market taro root is sold with the peel intact and the peels are removed prior to cooking. Taro peels resulting from commercial processing of taro into paste (poi) and fried chips have no further food or feed use." Residue data submitted in connection with PP#7E1982 showed no residues of captan on taro leaves collected 5 months after preplant treatment of the field at the 1X rate. No conclusions were made concerning the establishment of a tolerance on taro leaves in the Registration Standard. At the time these residue trials were conducted, THPI was not a residue of concern therefore, analyses were not conducted determining the residue levels of THPI.

According to the PD-4 on captan (dated 2/24/89) the levels of captan and THPI in a number of raw and processed agricultural commodities have been determined. Based on these data submissions THPI composes an "insignificant portion of the residue on raw agricultural commodities. Therefore, EPA no longer believes it necessary to estimate residues of THPI for RACs." However, in animal commodities, THPI is included in the residue level determinations.

IR-4, in their current request, contends that since no residues of captan were detected in the taro peel and root it is reasonable to conclude there would be no residues of captan in whole taro roots. The data submitted previously in support of a tolerance on taro leaves showed no detectable residues. Further, the captan treatment associated with taro is a preplant application and the taro roots are not harvested within one year of the application. IR-4 considers this a non-food use. Lastly, less than 400 acres of wetlands in Hawaii are cultivated for taro, which is a very minor use.

DEB recognizes this issue involves less than 400 acres of wetlands in Hawaii where residue trials show no captan residues in the taro root, peel, or leaves. It is unlikely that residues of captan and THPI would occur in the whole taro root. Therefore, the requirements for additional data regarding residue on whole taro root should be waived.

cc: RF, Circ, Reg. Std. File, Subject F, JSmith, PMSD/ISB.
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