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

Nov 19 1999

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Captan Registration Standard Data Requirements.
Chevron Letters of 8/22/86 and 10/ 8/86.
No Accession Numbers. RCB No. 1612 and 1613.

FROM: Lynn M. Bradley, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Lynn M. Bradley

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

ARR

TO: Eugene Wilson, PM Team 23
Fungicide-Herbicides Branch
Registration Division (TS-767)

Chevron Chemical Company's letter of 10/8/86 was written to document our meeting of 9/25/86. The 8/22/86 letter deals with a plant metabolism question which was answered at the 9/25/86 meeting Chevron's understanding of the points agreed upon is in agreement with ours, as documented in the attached Memo of Conference (L. M. Bradley, 10/1/86).

We would like to clarify the last sentence under Poultry and Livestock Metabolism in Chevron's letter. The metabolites which Chevron plans analyses for in feeding studies may need to include metabolites identified in the metabolism studies. RCB cannot be certain that only THPI and 3- and 5-OH THPI will comprise the residue of concern.

Also, under Plant Metabolism, Chevron states "we agreed that the only metabolite of concern in the plant is THPI." This should be regarded as a tentative conclusion until the side chain metabolism studies are completed and reviewed.

RD may wish to send a copy of our 10/1/86 Memo of Conference.

Attachment (not CBI)

cc:RF, Circu, LMBradley, Captan Reg. Std. File, PMSD/ISB
RDI:ARRathman:11/14/86:RDSchmitt:11/14/86
TS-769:RCB:CM#2:RM810b:X7378:LMBradley:wh:11/18/86

PMSD/ISB 1218

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

OCT 1 1986

MEMORANDUM

OFFICE OF
PESTICIDE AND TOXIC SUBSTANCES

SUBJECT Memo of Conference. September 25, 1986. Captan.
Registration Standard and Special Review Data Call-In
Requirements.

FROM: Lynn M. Bradley, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: The Files

Attendees: Captan Task Force--Jim Leary, Chevron
Joe White, Chevron
Wayne Hildebrandt, Stauffer
Merle Kleinschmidt, Stauffer

EPA--Bill Boodee, RCB
Lynn Bradley, RCB
Marian Copley, Tox

Eugene Wilson, PM Team 21
Henry Jacoby, PM 21

The topics discussed were plant and animal metabolism studies, seed treatments, aerial application data requirements, and the audit of the 1976 cow feeding study. A summary of conclusions reached follows.

1. Animal Metabolism. Three studies are needed--side chain label in both ruminants and poultry, and a carbonyl label study in poultry.

2. Plant Metabolism The standard requires lettuce and potato studies with carbonyl and side chain label. Since potatoes will be dropped, as will most post-harvest uses, it was agreed that studies on tomatoes and lettuce would be satisfactory. Lettuce, although not being retained, is readily grown in a greenhouse, and will serve as a third type of crop.

3. Seed Treatments. Our 9/6/86 review had not yet been transmitted. Six studies will satisfy the Reg. Std. requirement if no residues are found. If additional residues of concern are identified from the metabolism studies, seed treatment studies will need to be repeated.

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4. Aerial Application. After some discussion it was agreed that side-by-side studies of one crop in each group, with adequate geographical representation, would be sufficient. If aerial residues are higher (unexpected), additional studies to support a higher tolerance might be needed.

5. Study Audit. Harris Labs cannot find the raw data for the cow feeding study. It is likely that the study will thus be declared invalid. Jacoby recommended that a new study be commissioned after review of the metabolism studies is completed.

The conflicting schedules of the two processes (Special Review and Registration Standard) were repeatedly mentioned, and the surprise requirements of the Standard, after the Special Review DCI, were the particular subject of complaint. If new metabolites are identified in plants, many residue studies will need to be repeated. Also, dissatisfaction with the concurrent scheduling of Special Review and Registration Standards was discussed.

cc: Reg. Std. file, s.f., r.f., LMB(2), Boodee, E. Wilson, C. Monroe

TS-769:LMB:9/26/86:557-7378

RDI:A.R.Rathman:9/30/86:R.D.Schmitt:9/30/86