



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

JUN 19 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: TX-910007. Captan Seed Treatment on Peanuts. No MRID #.
DEB # 8080.

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TO: Joanne Miller, PM # 23
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The Texas Department of Agriculture has issued a Section 24 (c) registration for the seed treatment use of TOPS PC (no EPA Reg # or pending application) on peanuts. There are three active ingredients in this product: thiophanate methyl, pentachloronitrobenzene, and captan. Captan is N-trichloromethylthio-4-cyclohexene-1,2-dicarboximide. The applicant is Gustafson, Inc. CBII-RS has been asked to address whether seed treatment with captan is a food or non-food use.

No tolerance is established for residues of captan in or on peanuts [40CFR180.103]. Peanut was among the crops for which captan seed treatment was registered without tolerances.

A tolerance for residues of thiophanate methyl is established at 0.2 ppm in/on peanuts from foliar use [40CFR180.371]. An interim tolerance for residues of pentachloronitrobenzene is established at 1 ppm in/on peanuts from foliar treatment [40CFR180.319].

The proposed 24 (c) label would permit up to 5 oz TOPS PC/100 lbs seed or 2 oz captan/100 lbs seed. This would translate to a seed treatment rate of 0.56 gm captan/lb seed or 0.56 mg captan/seed. [There are 1,000 seeds in a pound of peanuts; see Branch Cultural Practice File].

For a seed treatment to be considered a non-food use, data from a radiotracer study is required demonstrating no uptake of activity to the aerial portion and edible root portion of the growing crop. Since carbon-14 residues are taken up into the pods (up to 0.009 ppm activity), stems and leaves (up to 0.012 ppm) of soybeans grown from seed treated with captan (0.164 mg captan/seed), the Residue Chemistry chapter (8/15/85) concluded that seed treatment must be considered a food use. Radiotracer data for peanuts are not available.

CONCLUSIONS AND RECOMMENDATION

For a seed treatment to be considered a non-food use, radiotracer data must demonstrate no distribution of activity to the aerial portion and edible root portion of the crop grown from treated seed. Radiotracer data for peanuts are not available.

Radiotracer data on soybeans indicate uptake of activity into the pods, stems and leaves of soybeans grown from captan-treated seed.

CBRS concludes that the use described in the SLN label TX-910007 is a food use for which tolerances are required.

cc:Circ, RF, Section 24 (c) F, Cheng, PIB/FOD
RDI:FSuhre:6/14/91:EZager:6/18/91
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