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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Memo of Conference June 20, 1985 regarding Captan DCI
letter of 4/29/85.

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: Files

Attendees:	Nancy Rachman	Chevron
	Zachariah Wong	"
	Jim Leary	"
	Bill Schneider	TOX
	Quang Bui	"
	Marion Copley	"
	Jane Harris	"
	Andy Rathman	RCB
	Lynn Bradley	"
	Jeff Kempter	SRB
	Geri Werdig	DCI

TOX issues were discussed first, then the residue chemistry issues, as outlined below:

- 1) The Agency has changed its policy stance, and no longer considers seed treatments to be non-food uses unless ^{14}C data shows absence of activity in plants grown from the treated seed.

- 2) Regarding large animal feeding studies, Chevron maintains that such a study already exists, with THPI and 3-OH THPI residue data. Apparently, RCB has not reviewed this study. They have submitted the study to PM Team, and will reference the study and request a data waiver for the 5-OH THPI metabolite.
- 3) Chevron wanted to use the captafol poultry feeding study, but RCB explained that we consider that study unacceptable because the residue levels in feed for one group did not match the nominal levels, and no data for 5-OH THPI were submitted. Chevron will request a data waiver for 5-OH THPI, but will likely perform the study.
- 4) RCB tentatively agreed to accept Chevron's proposal to do residue reduction studies on field-treated samples from current residue trials as part of a tiered scheme for testing. Testing on field-treated sample is considered far superior to spiked samples. RCB also requested that apples treated post-harvest be included.

If Captan/THPI residues are not mostly destroyed or lost during cooking or washing and peeling, then the remainder of the studies spelled out in the DCI letter will be needed. Chevron will submit a data waiver proposing this scheme.

Geri Werdig stressed that extensions and waivers are rarely being granted (solid reasons, as for those discussed above, may be considered), and that delays in data submission are being dealt with harshly.

TS-769:RCB:L.Bradley:vg:CM#2:Rm810:X77377:6/28/85
cc: Captan S.F., LMB, Circu., Reading File, PP#3F2898,
C. Langley (PM-73)
RDI: A. Rathman, 6/24/85; R. Schmitt, 6/25/85