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

OCT 3 1 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Captan. Alternative Program for Residue
Reduction Data as required in Data Call-In
Letter of April 29, 1985. No Accession Number.
RCB #59

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

TO: Bruce Kapner, PM 72
Special Review Branch
Registration Division (TS-767C)

and

Barbara Briscoe
Data Call-In Staff
Registration Division (TS-767C)

and

Amy S. Rispin, Chief
Science Integration Staff
Hazard Evaluation Division (TS-769C)

and

Office of Compliance Monitoring
Office of Pesticides and Toxic Substances (EN-342)

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

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Chevron Chemical Company is formally proposing an alternative program for satisfying the Residue Reduction Data Requirements of the April 29, 1985 Captan Data Call-In letter. This program was discussed informally in a meeting held on June 20, 1985, among Residue Chemistry Branch (RCB), Special Review, Data Call-In, and Chevron representatives. At that time, RCB agreed that residue reduction data on a limited number of field-treated crops would be preferable to studies performed on fortified crop samples as originally requested. When that original request was made, we were unaware that captan field trials were in progress, and had opted for fortification of samples to provide usable data in a reasonable timeframe.

Chevron's current proposal agrees with the discussions held in June. Residue reduction data for field-treated crops will be provided.

There are several discrepancies between what the letter states and the actual proposal's list of crops and processes to be used for residue reduction studies. Apples are not on the list, however, the letter states (and the informal agreement was) that residue data on apples will be submitted.

Further, Chevron's letter states that complete processing studies will be done on apples, citrus, and grapes, although the list indicates only juice data would be submitted. We would like to have residue analyses for all products from these processing studies. This will enable us to better calculate residue levels likely to be consumed by animals as well as humans.

Provided that apples are included and that complete results of the processing studies are submitted, RCB considers that this alternative proposal for obtaining Residue Reduction Data is preferable to our original requirement.

Chevron requests a 3-month time extension to allow for processing some samples after harvest. This request is reasonable; the time extension is necessary to enable the studies to be performed on field-treated crops. We recommend that the time extension be granted.

Conclusions and Recommendations

1. The proposed alternative program for Residue Reduction Data is superior to what we originally requested, and will satisfy our requirements for residue reduction studies, provided that apple data and complete results of processing studies are included as indicated in Chevron's letter.
2. The requested 3-month extension is necessary to allow satisfactory completion of this alternative program. We recommend that this time extension for the Residue Reduction Data be granted.

cc: Captan S.F., LMB (2 copies), Reading File, Circ.
PMSD/ISB