Shaughnessey No. 081301

Date Out EFB: 0 4 JAN 1984

To:

Jacoby

Product Manager 21

Registration Division (TS-767)

Fram:

Samuel Creeger, Chief Review Section No. 1

Exposure Assessment Branch

Hazard Evaluation Division (TS-769)

Attached please find the environmental fate review of:		
Reg./File No: 7501-EUP-E		
Chemical: Captan		
Type Product: Fungicide		
Product Name: Captan Seed Protectant		
Company Name: Gustafson		
Submission Purpose: use on corn, sorg	hum, and soybean seeds	
ZBB Code: <u>other</u>	ACTION CODE:	740
Date in: 10/14/83	EFB # 402	3
Date completed: 1/4/84	Tais (level II)	Days
·	52	2.50
Deferrals To:		
Ecological Effects Branch		
Residue Chemistry Branch		
Toxicology Branch		

1.0 INTRODUCTION

Gustafson, Inc. has submitted an application for an Experimental Use Permit for the seed treatment of corn (field and sweet), sorghum, and soybeans with captan (N-(trichloromethylthio)-4-cyclohexene-1,2-dicarboximide. No environmental data were submitted.

The program would involve the use of 2100 lb ai used to treat 9,000 bushels each of sorghum and field and sweet corn seed and 8,500 bushels of soybeans at commercial seed treatment plants in Illinois, Indiana, Iowa, Nebraska, Ohio, and Texas.

2.0 CHEMICAL STRUCTURE AND PROPOSED USE PATTERN

Chemical Structure:

See the attached label for the proposed use pattern.

3.0 CONCLUSIONS

Although captan has registered uses, a review of the EAB files shows that the only data requirement which has been completely satisfied is anaerobic aquatic metabolism (satisfied for seed treatment only). There are numerous references in the files to open literature citations, but none of these have been submitted to the EAB for review. An hydrolysis study was rejected in our review of 11/22/77 because only a summary of the cited paper was submitted without any methodologies, material balances or mathematical calculations. An aerobic soil metabolism study was reviewed on 1/10/75 and found to be deficient because there was not an accounting for the ring portion of the molecule.

Even though a seed treatment is not a food use, the minimum data requirements for an EUP are a hydrolysis study and an aerobic soil metabolism study. EAB cannot concur with further uses of captan until these minimal data requirements are met.

Norma Kay Whetzel January 4, 1984

Review Section No. 1

Environmental Fate Branch

Hazard Evaluation Division

Captan Science Reviews

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Luge	ure not included in our copy.
The mat	terial not included contains the following type of ation:
	Identity of product inert ingredients.
<u></u> 1	Identity of product inert impurities.
I	Description of the product manufacturing process.
I	Description of product quality control procedures.
	Identity of the source of product ingredients.
	Sales or other commercial/financial information.
<u>X</u> 2	A draft product label.
	The product confidential statement of formula.
	Information about a pending registration action
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