Shaughnessey No. 081301

Date Out EFB: 0 4 JAN 1984

To:

Jacoby

Product Manager 21

Registration Division (TS-767)

From:

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: 239-1246 239-2351		
Chemical: Captan	ijema pravilski pravi i more na objevo obskoj ob osvoranjim ijemija objekti plavjeko objekti poseteli	
Type Product: Fungicide		
Product Name: Orthocide		
Company Name: Chevron		
Submission Purpose: label ammendment	; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	
ZBB Code: other	ACTION CODE: 45	0_400
	ACTION CODE: 45	
Date in: 10/11/83	EFB #400	7-08
Date completed: 1/4/84	Tais (level II)	Days
	63/64	2.50
Deferrals To:		
Ecological Effects Branch		
Residue Chemistry Branch		
Toxicology Branch		

1.0 INTRODUCTION

Chevron Chemical Company has submitted an application and data in support of a label ammendment for ORTHOCIDE 65 Seed Protectant and product chemistry data to support four alternate formulas.

A list of data citations which have been submitted by Chevron to the agency to satisfy data requirements and open literature citations which are deemed by Chevron to satisfy data requirements also accompanies the submission.

2.0 CHEMICAL STRUCTURE AND PROPOSED LABEL

Chemical Structure:

See the attached proposed label.

3.0 DISCUSSION OF DATA

3.1 The Anaerobic Soil Metabolism of [Carbonyl-14C] Captan, D.E. Pack. Chevron Chemical Company. File No. 721.14, September 14, 1979. Acc Nos. 251400 and 251403.

This study has been previously reviewed (3/24/80 and 2/21/80) and found to be acceptable for seed treatment only.

3.2 Environmental Fate Data Requirements 158.130. Data citations for Captan. Chevron Chemical Company. September 28, 1983.

As far as can be determined from the EAB files, the open literature citations were never submitted for review except by reference and the Chevron company studies were reviewed. The only study which has been accepted to date as satisfying any EAB data requirement is the one which accompanies this submission and is reviewed in 3.1 above.

4.0 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 soil 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 EAB data requirements are a hydrolysis study and an aerobic soil metabolism study. It is not clear from the submission if this ammendment is for new uses of captan or if it is for minor technical or administrative changes. In any case, 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

Page is not included in this copy.		
Pages	s <u>4</u> through <u>7</u> are not included in this copy.	
The mat informa	terial not included contains the following type of ation:	
]	Identity of product inert ingredients.	
3	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.	
8	Sales or other commercial/financial information.	
<u> </u>	A draft product label.	
	The product confidential statement of formula.	
	Information about a pending registration action	
I	FIFRA registration data.	
	The document is a duplicate of page(s)	
	The document is not responsive to the request.	
by prod	formation not included is generally considered confidential duct registrants. If you have any questions, please contact dividual who prepared the response to your request.	