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

MAR 13 1986

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA No. 4581-322: Thiophanate-Methyl (Topsin® M),
Amended Registration to Permit Application to
Cucurbits. (Supplemental Information). Accession
No. 261152; RCB No. 516

FROM: Joel Garbus, Chemist *SG*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THROUGH: A. Rathman, Head *ARR*
Special Registration Section I
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: H. Jacoby, PM-21
Registration Division (TS-767)

The Agchem Division of the Pennwalt Corporation, Philadelphia, PA, has submitted supplemental information to an application for an amended registration for Topsin® M (thiophanate methyl) fungicide on cucurbits (PP#2F2729). RD has requested that RCB review the application for the amended registration in light of the supplemental information.

RCB has reviewed PP#2F2729 as a petition to establish permanent tolerances of thiophanate-methyl on cucumbers, melons, pumpkins, summer squash, winter squash, grapes, pineapples, and rice. RCB concluded that the proposed tolerance of 1 ppm in or on the cucurbit group crops was supported by the submitted residue data. RCB also concluded that the analytical method was adequate and suitable for enforcement purposes, (R. W. Cook, memo of 11/30/82).

Subsequently, a tolerance of 1.0 ppm was established on cucumbers, melons, pumpkins, and squash by amending 40 CFR 180.371, [49 FR: 247: 49626 (12/21/84)].

The supplemental information that Pennwalt has submitted consists of: 1) a proposed label subsuming the directions for use on individual cucurbit group crops under the heading "For Use On Cucurbits (Cucumbers, Melons, Pumpkins, Summer and Winter Squash)" and 2) raw data in the form of UV scans of residue data presented to support the cucurbit tolerance request. According to the cover letter accompanying this submission, the UV scans are supplied in response to a verbal request from RCB expressing concerns about the proposed labeling.

We have not found a record of such a verbal request in the RCB files nor do we understand the relevance of such a request to proposed crop group labeling. We note that RCB's original review stated, "tolerances should be set on the the individual crops, since the term cucurbits refers to the crop grouping for negligible residues, and the proposed tolerance is not negligible." (R. W. Cook, memo, 11/30/82) However, in a later memo RCB indicated that it now considered it possible to establish a crop group tolerance for cucurbits. (R. W. Cook, memo, 4/17/84) However, the tolerance expression has not been revised to include the crop group cucurbits. We do consider the labeling as submitted to be acceptable as it does list the individual crops for which tolerances are established.

As the analytical method was considered adequate for residue studies of thiophanate-methyl on cucurbits and as tolerances are now established on these crops, we do not consider that the raw data in the form of UV scans to be of any pertinancy. We will accept the data, per se, and add it to the thiophanate-methyl data base.

Note to PM: If the registrant desires to allow the use of Topsin M on the crop group cucurbits, per se rather than on the individual crops for which tolerances are established, they should be advised to petition for a cucurbit crop group tolerance.

cc: R. F., S. F., Circ., Reviewer, PP#2F2729, PMSD/ISB
RDI:ARR 3/11/86:RDS:3/11/86
TS-769:RCB:JG:jg:CM#2:557-1864:3/12/86