EPA Registration # 66330-31

Volume 2

RED; Reregistration

66330-31

Reregistration

D 321486

D321486 5798149

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
66330-31	DEC 4 2006

Terms of Issuance:
Conditional

NOTICE OF PESTICIDE:
____ Registration
_XX_ Reregistration
(under FIFRA, as amended)

Name of Pesticide Product:
Captan Technical

Name and Address of Registrant (include ZIP Code):
Arysta LifeScience North America Corporation
15401 Weston Parkway, Suite 150
Cary, NC 27513

Rereg

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Reregistration Eligibility Document(s) and the accepted label stamped September 29, 2006, EPA has reregistered the product listed above.

This reregistration action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Signature of Approving Official:	Date:
Tony Kish Tony Kish, Product Manager (22) Registration Division, Fungicide Branch	DEC 4 2006

EPA Form 8570-6

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

INGREDIENTS:	By Wt.
ACTIVE INGREDIENTS:	
Captan*	90.85%
Related Derivatives	2.00%
INERT INGREDIENTS:	7.15%
TOTAL	100.00%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31 **Net Contents: ___ lbs (___ kg)**
EPA Est. No.: _____

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN
Probable mucosal damage may contraindicate the use of gastric lavage.

ACCEPTED
SEP 29 2006
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 66330-31

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Produced For:

ARYSTA LIFESCIENCE NORTH AMERICA CORPORATION
15401 WESTON PARKWAY, SUITE 150
CARY, NC 27513

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER
Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Harmful if absorbed through the skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wear goggles or face shield when handling. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. Do not contaminate water when disposing of equipment washwaters. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact Arysta LifeScience North America Corporation at 866-761-9397.

Only for formulation into a fungicide for the following use(s):
Wettable powder formulations must prohibit aerial application on their end use product labels unless packaged in water soluble packets.

Seed Treatments:		
Alfalfa		
Beans	Cucumbers	Pumpkins
Beets	Eggplant	Radish
Broccoli	Flax	Rape
Brussels Sprouts	Grasses	Rutabaga
Cabbage	Honeydew	Safflower
Cantaloupe	Kale	Sesame
Carrots	Lentils	Sorghum
Cauliflower	Lespedeza	Soybeans
Cereal Grains	Lettuce	Spinach
--Barley, Rye	Melons	Squash
--Oats	Milo	Sugar Beets
--Wheat	Muskmelons	Sunflowers
Clover	Mustard Greens	Swiss Chard
Collards	Okra	Tomato
Corn (field, pop, sweet)	Onions	Trefoil
Cotton	Peanuts	Turnip
Cowpea	Peas	Watermelon
	Peppers	
	Potato (Seed Piece)	

Foliar Treatment:		
Almonds	Cherries	Plums (Fresh Prunes)
Apples	Dewberries	Raspberries
Apricots	Grapes	Strawberries
Blackberries	Nectarines	
Blueberries	Peaches	

Post-Harvest Dip:		
Apples	Cherries	Pears

Pre-Plant Root Dip:
Peaches

Non-Food/Ornamentals:		
Azaleas	Conifers	Flowering Plants
Begonias	Dichondra	Roses
Camellias	Ginseng	
Carnations	Gladiolus	
Chrysanthemums	Turf (golf courses) and sod farms	

Soil:
Seed beds and greenhouse bench treatment

Indoor/Industrial:		
Paints	Plastics	Adhesives

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

CONDITIONS OF SALE

1. Arysta LifeScience North America Corporation ("Arysta") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under conditions not reasonably foreseeable to Arysta. **ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE OR MERCHANTABILITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM OR IN CONNECTION WITH THE MANUFACTURE, SALE, DELIVERY, USE, HANDLING OR STORAGE OF THIS PRODUCT. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARYSTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond the control of Arysta prevent Arysta from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though the product is reasonable fit for the use stated on the label even though label directions are followed. Except as stated in 1 above, the Buyer and User acknowledge and to the extent consistent with applicable law, assume all risks and liability resulting from handling, storage, and use of this product.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date November 29, 2006	EPA Reg. No./File Symbol 66330-31	Page 1 of 8
Applicant's/Registrant's Name & Address: Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513	Product Captan Technical	

Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT CHEMISTRY DATA					
OPPTS 830.1550	Product Identity and Composition	45192312	Arysta LifeScience	OWN	
OPPTS 830.1600	Description of Materials Used to Produce the Product	40021301	Arysta LifeScience (Chevron / Stauffer)	OWN	1
OPPTS 830.1620	Description of Production Process	40021301	Arysta LifeScience (Chevron / Stauffer)	OWN	1
OPPTS 8/30.1670	Discussion of Formation of Impurities	40021301	Arysta LifeScience (Chevron / Stauffer)	OWN	1
OPPTS 830.1700	Preliminary Analysis	45216201	Arysta LifeScience	OWN	
OPPTS 830.1750	Certified Limits	45192312	Arysta LifeScience	OWN	
OPPTS 830.1800	Analytical Method	45216201	Arysta LifeScience	OWN	
OPPTS 830.6302	Color	45192312	Arysta LifeScience	OWN	
OPPTS 830.6303	Physical State	45192312	Arysta LifeScience	OWN	
OPPTS 830.6304	Odor	40021202	Arysta LifeScience (Chevron / Stauffer)	OWN	1
OPPTS 830.7000	pH	40231801	Arysta LifeScience (Chevron)	OLD	1
OPPTS 830.7300	Bulk Density	40231801	Arysta LifeScience (Chevron)	OLD	1
OPPTS 830.7200	Melting Point/Melting Range	40231801	Arysta LifeScience (Chevron)	OLD	1
OPPTS 830.6314	Oxidizing/Reducing Properties	45192312	Arysta LifeScience	OWN	
OPPTS 830.6316	Explodability	45192312	Arysta LifeScience	OWN	
OPPTS 830.6315	Flammability	45192312	Arysta LifeScience	OWN	
OPPTS 830.7840	Water Solubility	40231801	Arysta LifeScience (Chevron)	OLD	1
OPPTS 830.7860	Solubility	40231201	Arysta LifeScience	OWN	
OPPTS 830.8550	Octanol/Water Partition Coefficient	40021202	Arysta LifeScience (Chevron / Stauffer)	OWN	1
OPPTS 830.6313	Stability	40231801	Arysta LifeScience (Chevron)	OLD	1
OPPTS 830.7220	Boiling Point	45192312	Arysta LifeScience	OWN	

Signature Doina Bujor	**Name and Title:** Doina Bujor / Regulatory Manager	**Date** 09/29/06

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Applicant's/Registrant's Name & Address: Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513	Product Captan Technical	
Ingredient(s): Captan, CAS # 133-06-2		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 830.7370	Dissociation Constant	45192312	Arysta LifeScience	OWN	
OPPTS 830.6317	Storage Stability	45192312	Arysta LifeScience	OWN	
OPPTS 830.6320	Corrosion Characteristics	45192312	Arysta LifeScience	OWN	
OPPTS 830.7950	Vapor Pressure	45285812	Arysta LifeScience	OWN	
TOXICITY DATA					
OPPTS 870.1100	Oral Acute Toxicity	45288201	Arysta LifeScience	OWN	
OPPTS 870.1200	Acute Dermal Toxicity	45288202	Arysta LifeScience	OWN	
OPPTS 870.2500	Primary Dermal Irritation	40021401	Arysta LifeScience	OWN	
OPPTS 870.1300	Acute Inhalation	45288203	Arysta LifeScience	OWN	
OPPTS 870.4100	Chronic Toxicity - Dog	41472501	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.4100	Chronic Toxicity - Mice	00151472	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.4100	Chronic Toxicity - Mice	43875602	Arysta LifeScience (Zeneca)	OWN	1
OPPTS 870.4200	Carcinogenicity - Mice	43393502	Arysta LifeScience (Chevron)	OLD	1
OPPTS 870.4200	Carcinogenicity - Rat	00153284	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.3800	Reproduction and Fertility Effects (1 generation - rat)	00120315	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.3800	Reproduction and Fertility Effects (3-generation - rat)	00153306	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.3700	Prenatal Developmental Toxicity (hamster)	00130848	Arysta LifeScience (Chevron)	OLD	1
OPPTS 870.3700	Prenatal Developmental Toxicity (rabbit)	41826901	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.5460	Rodent Heritable Translocation Assay	00131710	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.5200	Mouse Visible Specific Locus Test	43405102	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.5900	In *Vitro* Sister Chromatid Exchange Assay	00131703	Arysta LifeScience (Chevron)	OLD	1
OPPTS 870.5550	Unscheduled DNA Synthesis in Mammalian Cells in Culture	43393501	Arysta LifeScience (ICI)	OWN	1

Signature	Name and Title: Dolna Bujor / Regulatory Manager	Date 09/29/06

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Applicant's/Registrant's Name & Address: Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513	Product Captan Technical	

Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 870.3465	Subchronic Inhalation Toxicity - Rat	41234402	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.3465	Subchronic Inhalation Toxicity - Rat (preliminary)	41234401	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.3150	Subchronic Non-rodent Oral Toxicity - 90 days	40893605	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 870.3200	Repeated Dose dermal Toxicity - 21-day - Rabbit	40273201	Arysta LifeScience (Chevron / Stauffer)	OWN	1
N/A	Investigation of Duodenal Hyperplasia in Mice	43393503	Arysta LifeScience (Zeneca)	OWN	1
N/A	Second Investigation of Duodenal Hyperplasia in Mice	43393504	Arysta LifeScience (Zeneca)	OWN	1
OPPTS 870.7600	Dermal Absorption - rat	43074701	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.7485	Metabolism and Pharmacokinetics	43012902	Arysta LifeScience (ICI)	OWN	1
OPPTS 870.7485	Metabolism and Pharmacokinetics	41505403	Captan Task Force	OWN	
OPPTS 870.7485	Metabolism and Pharmacokinetics	41505401	Captan Task Force	OWN	
OPPTS 870.7485	Metabolism and Pharmacokinetics	41505402	Captan Task Force	OWN	
OPPTS 870.7485	Metabolism and Pharmacokinetics	41505404	Captan Task Force	OWN	
OPPTS 870.7485	Metabolism and Pharmacokinetics	40658001	Captan Task Force	OWN	
N/A	Stability of Captan in Whole Blood	44990101	Captan Task Force	OWN	
REENTRY PROTECTION DATA					
132-1	Foliar Dissipation	40988603	Arysta LifeScience (ICI)	OWN	1
132-1	Foliar Dissipation	40988604	Arysta LifeScience (ICI)	OWN	1
132-1	Foliar Dissipation	40988601	Arysta LifeScience (ICI)	OWN	1
132-1	Foliar Dissipation	40988602	Arysta LifeScience (ICI)	OWN	1
132-1	Foliar Dissipation	40323902	Arysta LifeScience (ICI)	OWN	1
ENVIRONMENTAL					

Signature	**Name and Title:** **Doina Bujor / Regulatory Manager**	**Date** 09/29/06

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Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
FATE DATA					
161-1	Hydrolysis	40208101	Captan Task Force	OWN	
161-2	Photodegradation in water	40208102	Captan Task Force	OWN	
161-2	Degradation in sediment-water system - Lab.	43869805	Arysta LifeScience (ICI)	OWN	1
161-3	Photodegradation ion soil	40658009	Captan Task Force	OWN	
161-4	Photodegradation in air	40182301	Captan Task Force	OWN	
162-1	Aerobic soil metabolism	44044601	Arysta LifeScience (ICI)	OWN	1
163-1	Leaching and adsorption/desorption	43869811	Arysta LifeScience (ICI)	OWN	1
163-1	Leaching and adsorption/desorption	43869804	Arysta LifeScience (ICI)	OWN	1
163-2	Volatility - Laboratory	40231901	Captan Task Force	OWN	
163-2	Volatility - Lab. (*cis*tetrahydrophthalmic acid)	43886901	Arysta LifeScience (ICI)	OWN	1
161-2	Degradation in sediment-water system - Lab.	43869805	Arysta LifeScience (ICI)	OWN	1
161-3	Photodegradation ion soil	406580101	Captan Task Force	OWN	
161-3	Photodegradation ion soil	40658009	Captan Task Force	OWN	
161-4	Photodegradation in air	40182301	Captan Task Force	OWN	
162-1	Aerobic soil metabolism	44044601	Arysta LifeScience (ICI)	OWN	1
163-1	Leaching and adsorption/desorption	43869811	Arysta LifeScience (ICI)	OWN	1
163-1	Leaching and adsorption/desorption	43869804	Arysta LifeScience (ICI)	OWN	1
163-2	Volatility - Laboratory	40231901	Captan Task Force	OWN	
163-2	Volatility - Lab. (*cis*tetrahydrophthalmic acid)	43886901	Arysta LifeScience (ICI)	OWN	1
164-1	Field dissipation study	40932201	Captan Task Force	OWN	
164-1	Field dissipation study	40893602	Captan Task Force	OWN	
164-1	Field dissipation study	40893601	Captan Task Force	OWN	
164-1	Field dissipation study	40932202	Captan Task Force	OWN	

Signature Doina Bujor	**Name and Title:** Doina Bujor / Regulatory Manager	**Date** 09/29/06

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Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
WILDLIFE AND AQUATIC ORGANISMS DATA					
OPPTS 850.2100	Avian acute oral toxicity test	00020560	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 850.2200	Avian dietary toxicity test	43869802	Arysta LifeScience (ICI)	OWN	1
OPPTS 850.2200	Avian dietary toxicity test	43869803	Arysta LifeScience (ICI)	OWN	1
OPPTS 850.2300	Avian reproduction	00098295	Arysta LifeScience (Chevron)	OLD	1
OPPTS 850.2300	Avian reproduction	00098296	Arysta LifeScience (Chevron)	OLD	1
OPPTS 850.1075	Fish acute toxicity test, freshwater and marine	44806504	Captan Task Force	OWN	
OPPTS 850.1075	Fish acute toxicity test, freshwater and marine	44909004	Captan Task Force	OWN	
OPPTS 850.1075	Fish acute toxicity test, freshwater and marine	43869806	Arysta LifeScience (Zeneca)	OWN	1
OPPTS 850.1010	Aquatic invertebrate acute toxicity freshwater, daphnids	43869807	Arysta LifeScience (Zeneca)	OWN	1
OPPTS 850.1025	Oyster acute toxicity (shell deposition	46061701	Captan Task Force	OWN	
OPPTS 850.1035	Mysid acute toxicity test	44806505	Captan Task Force	OWN	
OPPTS 850.1035	Mysid acute toxicity test	44909005	Captan Task Force	OWN	
OPPTS 850.1300	Daphnid chronic toxicity	44148801	Arysta LifeScience (ICI)	OWN	1
OPPTS 850.1400	Fish early-life stage toxicity test	00057846	Arysta LifeScience (Chevron)	OLD	1
OPPTS 850.4400	Aquatic plant toxicity	44806503	Captan Task Force	OWN	
OPPTS 850.4400	Aquatic plant toxicity	44909003	Captan Task Force	OWN	
OPPTS 850.5400	Algal toxicity	43869809	Arysta LifeScience (ICI)	OWN	1
OPPTS 850.4400	Aquatic plant toxicity	44806501	Captan Task Force	OWN	
OPPTS 850.4400	Aquatic plant toxicity	44909001	Captan Task Force	OWN	
OPPTS 850.4400	Aquatic plant toxicity	44806502	Captan Task Force	OWN	

Signature	Name and Title: Doina Bujor / Regulatory Manager	Date 09/29/06

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WASHINGTON, D.C. 20460

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Date November 29, 2006 | EPA Reg. No./File Symbol 66330-31 | Page 6 of 8

Applicant's/Registrant's Name & Address:
Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513

Product
Captan Technical

Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 850.4400	Aquatic plant toxicity	11909002	Captan Task Force	OWN	
RESIDUE CHEMISTRY DATA					
OPPTS 860.1300	Nature of Residues - Plants	42109601	Captan Task Force	OWN	
OPPTS 860.1300	Nature of residue - livestock	42568801	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1850	Confined rotational crop	42378401	Captan Task Force	OWN	
OPPTS 860.1850	Confined rotational crop	41404001	Captan Task Force	OWN	
OPPTS 860.1340	Residue analytical method	41393001	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1340	Residue analytical method	41386501	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1340	Residue analytical method	41406901	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1340	Residue analytical method	43548601	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1480	Magnitude of residues in meat/milk/poultry and eggs	42296002	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1480	Magnitude of residues in meat/milk/poultry and eggs	40010501	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1380	Storage stability data	43875603	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1340	Residue analytical method	40010501	Arysta LifeScience (Stauffer Chemical)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189802	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	407745402	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189803	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	00159597	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	00098825	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189804	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745403	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	42305401	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	42472202	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	42254201	Arysta LifeScience (ICI)	OWN	1

Signature

Name and Title:
Doina Bujor / Regulatory Manager

Date
09/29/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date November 29, 2006

EPA Reg. No./File Symbol 66330-31

Applicant's/Registrant's Name & Address:
Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513

Product
Captan Technical

Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 860.1500	Magnitude of residues	42252202	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189805	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	45605001	Arysta LifeScience	OWN	
OPPTS 860.1500	Magnitude of residues	41149104	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189806	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	41039101	IR-4	PER	
OPPTS 860.1500	Magnitude of residues	40189808	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	41149103	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189809	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189810	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189811	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745405	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189812	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	42305401	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	42472201	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	42254202	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189807	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745404	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189813	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189814	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745406	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745407	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745408	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189815	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	45605002	Arysta LifeScience	OWN	
OPPTS 860.1500	Magnitude of residues	40189813	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189818	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189817	Arysta LifeScience (Chevron)	OLD	1

Signature

Name and Title:
Dolna Bujor / Regulatory Manager

Date
09/29/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date November 29, 2006	EPA Reg. No./File Symbol 66330-31	Page 8 of 8
Applicant's/Registrant's Name & Address: Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513	Product Captan Technical	

Ingredient(s): Captan, CAS # 133-06-2

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 860.1500	Magnitude of residues	42712801	IR-4	PER	
OPPTS 860.1500	Magnitude of residues	43086601	IR-4	PER	
OPPTS 860.1500	Magnitude of residues	43600401	Captan Task Force	OWN	
OPPTS 860.1500	Magnitude of residues	44227201	IR-4	PER	
OPPTS 860.1500	Magnitude of residues	40189819	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189820	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	41149101	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	41306102	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189821	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	41149102	Arysta LifeScience (ICI)	OWN	1
OPPTS 860.1500	Magnitude of residues	40189822	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	00159607	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745408	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	43489701	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189824	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40189823	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	40745409	Arysta LifeScience (Chevron)	OLD	1
OPPTS 860.1500	Magnitude of residues	41306101	Arysta LifeScience (ICI)	OWN	1

Note 1 – Arysta LifeScience North America, formerly Aryesta Corporation, formerly Tomen Agro acquired Captan and the rights to all the studies from Zeneca formerly ICI Americas formerly Stauffer Chemicals.

Signature	**Name and Title:** Doina Bujor / Regulatory Manager	**Date** 09/29/06

Robert Westin/DC/USEPA/US
11/30/2006 01:19 PM

To "Bujor, Doina" <Doina.Bujor@arystalifescience.com>
cc
bcc
Subject Re: Captan Technical 66330-31

Hi Doina: I don't see any data citations covering the acute health effects of Primary Eye Irritation or Dermal Sensitization. How are you covering these data requirements?

Robert Westin

++=
"Bujor, Doina" <Doina.Bujor@arystalifescience.com>

"Bujor, Doina"
<Doina.Bujor@arystalifescience.com>
11/30/2006 10:39 AM

To Robert Westin/DC/USEPA/US@EPA
cc
Subject Captan Technical 66330-31

Sorry, I forgot the attachemnt

Doina Bujor
Regulatory Manager
Arysta LifeScience North America
919-678-4879
doina.bujor@arystalifescience.com

-----Original Message-----
From: ALSNAXRX
Sent: Thursday, November 30, 2006 5:37 AM
To: Bujor, Doina
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [ALSNAXRX@arystalifescience.com]
Number of Images: 8
Attachment File Type: PDF

Attachment File Type: ALSNA Mail Room
Device Name: XRX0000AA6C6178

For more information on Xerox products and solutions, please visit
http://www.xerox.com

Scan001.PDF

"Bujor, Doina"
<Doina.Bujor@arystalifescience.com>
11/30/2006 10:35 AM

To Robert Westin/DC/USEPA/US@EPA
cc
bcc
Subject Captan Technical 66330-31

Bob,

Attached is the Data Matrix for Captan Technical 66330-31. I will send you the original by mail with all the other EPs (-24, -26, -27, -28, -29) tomorrow for you to receive by Monday. I will be out of the office all next week. I would appreciate if you can take a quick look at this data matrix and let me know if any other corrections are needed so I can complete the formulations before I leave. Thank you again for your help.

Best regards,

Doina

Doina Bujor
Regulatory Manager
Arysta LifeScience North America
919-678-4879
doina.bujor@arystalifescience.com

"Bujor, Doina"
<Doina.Bujor@arystalifescience.com>
11/30/2006 03:08 PM

To Robert Westin/DC/USEPA/US@EPA
cc
bcc
Subject RE: Captan Technical 66330-31 Data Matrix

Those data requirements were waived and per Tony e-mail we do not have to mention them.

Doina Bujor
Regulatory Manager
Arysta LifeScience North America
919-678-4879
doina.bujor@arystalifescience.com

-----Original Message-----
From: Westin.Robert@epamail.epa.gov
[mailto:Westin.Robert@epamail.epa.gov]
Sent: Thursday, November 30, 2006 1:21 PM
To: Bujor, Doina
Subject: Re: Captan Technical 66330-31 Data Matrix

Hi Doina: I don't see any data citations covering the acute health effects of Primary Eye Irritation or Dermal Sensitization. How are you covering these data requirements?

Robert Westin

++=

"Bujor, Doina" <Doina.Bujor@arystalifescience.com>		To
	Robert Westin/DC/USEPA/US@EPA	
		cc
11/30/2006 10:39 AM		Subject
	Captan Technical 66330-31	

Sorry, I forgot the attachemnt

Doina Bujor
Regulatory Manager
Arysta LifeScience North America
919-678-4879
doina.bujor@arystalifescience.com

-----Original Message-----
From: ALSNAXRX
Sent: Thursday, November 30, 2006 5:37 AM
To: Bujor, Doina
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [ALSNAXRX@arystalifescience.com]
Number of Images: 8
Attachment File Type: PDF

Attachment File Type: ALSNA Mail Room
Device Name: XRX0000AA6C6178

For more information on Xerox products and solutions, please visit
http://www.xerox.com
(See attached file: Scan001.PDF)

Robert Westin/DC/USEPA/US

11/14/2006 11:20 AM

To Karen Jones/DC/USEPA/US

cc

bcc

Subject Please log out Data Package in OPPIN

Hi Karen:

Please log out the following data package so I can close the reregistration action in OPPIN

66330-31
D321486
S585512
DP283628

Thank you

Robert Westin

phone: 703-305-5721

Robert Westin/DC/USEPA/US

11/13/2006 02:50 PM

To "Bujor, Doina" <doina.bujor@arystalifescience.com>

cc

bcc

Subject reregistration captan technical 66330-31

Hi Doina: attached is a copy of the reregistration notice that Tony Kish signed today. Note that he is requireing a cleaned up data matrix for this technical product, and this corrected data matrix will be the basis of the generic data that you will have to include on the data matrices for all your end use products that use this technical.

rw rereg 11 13 06.pdf

Robert Westin

phone: 703-305-5721
FAX: 703-305-6920
email: westin.robert@epa.gov

++++++++++++++++++++++++++++++++++

New Instructions for Transmitting Information to the Office of Pesticide Programs, including New Addresses:

PR Notice 2006-1:
http://www.epa.gov/PR_Notices/pr2006-1.pdf

Robert Westin/DC/USEPA/US
04/11/06 11:51 AM

To "Bujor, Doina" <doina.bujor@arystalifescience.com>
cc
bcc
Subject Re: Captan Data Matrix

Hi Doina: according to my notes the request was in a 8/5/05 phone call where I asked for a corrected label reflecting the changes listed in the PRB Preliminary Label Assessment dated Feb. 14, 2005 and for a comprehensive data matrix for this product. Let me know if you can't find the 2/14/05 document and I'll send you another copy.

Robert Westin

phone: 703-305-5721
fax: 703-308-1825
email: westin.robert@epa.gov

+++
Until April 28:

US Mail Address:
Robert Westin
US EPA
Office of Pesticide Programs
Fungicide Branch (7505C)
Washington, DC 20460

Office - UPS/FedEx/deliveries location:
Robert Westin (Room 267)
Registration Division/Fungicide Branch
US EPA
1801 South Bell Street, Room 266A
Arlington, VA 22202

+++

The Office of Pesticide Programs (OPP) will be moving in May 2006! Effective May 8, 2006 the new OPP location will be:

One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

From May 1 - 5, 2006, no hand-carried or courier deliveries will be accepted at either our current location (CM2) or the new location. Hand-carried or courier deliveries to the Document Processing Desk (7504P) will be accepted beginning on May 8, 2006 at Room S-4900, One Potomac Yard.

The U.S. Postal Service address for OPP mail is unaffected by the OPP location change. The last delivery of US Postal Service mail to CM2 will be April 28, 2006. Mail will be held at EPA Headquarters until May 8, 2006. Please note that after the move, the letter in OPP's Mail Codes will change from a "C" (for Crystal) to a "P" (for Potomac).

"Bujor, Doina" <doina.bujor@arystalifescience.com>

"Bujor, Doina"
<doina.bujor@arystalifescience.com>
04/06/06 03:58 PM

To Robert Westin/DC/USEPA/US@EPA
cc
Subject Captan Data Matrix

Hi Bob,

During the move it looks like we lost or misplaced some files. Among them is the request to submit the data matrix for Captan Technical EPA Reg. No. 66330-31 and our response. Please send me a copy of the request. Thank you.

Best regards,

Doina

Doina Bujor
Regulatory Manager - Fungicides
Regulatory Affairs
15401 Weston Parkway, Suite 150
Cary, NC 27513
Tel: 919-678-4879
Fax: 919-678-2196
doina.bujor@arystalifescience.com

Harmony In Growth

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 14, 2005

MEMORANDUM:

Subject: Captan RED
CAPTAN TECHNICAL
EPA Reg. No.: 066330-031
Re: PRB Preliminary Label assessment

From: John L. Dupuy Ph.D 3/2/05
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Through Lawrence Schnaubelt 2/24/05
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

To: Cynthia Giles-Parker, Product Manager 22
Fungicide Branch
Registration Division (7505C)

SCOPE: The primary purpose of this preliminary label assessment is to determine whether or not the draft labels submitted in connection with product reregistration comply with amended labeling language specified in Chapter V of the subject RED. Product-specific data (product chemistry, acute toxicity, and in some cases efficacy data) were also required to be submitted or cited to support product reregistration. PRB's reviews of these data are appended to this assessment and may require additional revisions to the product label. Previously, PRB's preliminary label assessments reiterated the labeling changes specified in these reviews and often also included comments regarding labeling requirements specified in 40 CFR Part 156.10 and associated labeling policy documents such as the Label Review Manual, Pesticide Regulation Notices (PRNs), and/or Criteria and Policy Notices. In an effort to improve PRB's efficiency, and to avoid duplication of certain aspects of label reviews conducted by RD, this preliminary label assessment generally will not include comments regarding these other aspects of the label; and instead will focus primarily on the amended labeling language specified in Chapter V of the RED.

BACKGROUND: The registrant has submitted 5 copies of draft labeling for the subject product in its 8-month response to the RED. PRB has completed a preliminary assessment of the draft labeling. A copy of this assessment may be accessed electronically on the LAN through the Q:Drive in Word Perfect. The path is q:\prb\label\066330\031.

NOTE TO PM:

1) In addition to the information presented in this preliminary label assessment Product Managers/Label Reviewers must apply their own knowledge of the subject product and the product's regulatory history (including comparison with existing stamped accepted labeling) to conduct a final review of the proposed label. It is the responsibility of the PM to obtain the necessary label improvements required for final product reregistration.

2) In response to comments, the Agency recently amended the Captan RED which was issued in 1999. The document entitled "Summary of Required Labeling Changes for Captan" (or revised Captan label table) supercedes the labeling requirements originally listed in the RED. This document and the technical reviews serve as the basis for all labeling guidance in this assessment.
Please also note that SRRD is now implementing the proposed tolerance actions listed on Pages 66 - 71 of the Captan RED.

SUMMARY OF FINDINGS:

I RED Risk Mitigation:

The subject product label contains labeling requirements as specified in the revised label table.

II Technical Review Requirements:

The subject product label does not contain the required labeling as specified in the attached acute toxicity review.

As per the acute toxicity review:

- PRB recommends that additional text be added to the Note to Physician.

Refer to Appendix I for more details.

PRB recommends that the PMs continue to follow the guidance provided in the Label Review Manual, including formatting suggestions presented in the sample labels in Chapter 3, to improve the quality and consistency of product labels.

RECOMMENDATIONS:

The subject product requires revisions to conform with the revised label table for the Captan RED and acute toxicity review. Subject to final review by the Product Manager, PRB recommends that the registrant resubmit to the Product Manager revised product labeling that addresses the deficiencies specified in this review and any other deficiencies specified by the Product Manager.

Appendix I

PRB Label Analysis For Compliance With Label Revisions Specified In The RED/IRED and/or Technical Reviews

Label Requirement	Acceptable	Not Acceptable	Comments
Restricted Use Pesticide	N/A		
Ingredients Statement	X		
Signal Word	X		
First Aid	X		
Hotline Information	X		
Note to Physician	X		PRB recommends that the Note to Physician be revised to address the eye irritation concerns as specified in the acute toxicity review. PRB also recommends that additional text as specified in the acute toxicity review be added to the Note to Physician.
Hazards to Humans and Domestic Animals	X		
PPE	N/A		The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA , therefore, PPE has not been specified for this product.
Engineering Controls	N/A		
User Safety Requirements	N/A		
User Safety Recommendations	N/A		
Environmental Hazards	X		
Physical and Chemical Hazards	N/A		
WPS text	N/A		
Non-WPS text	N/A		
Storage and Disposal	X		
Spray Drift Labeling	N/A		

Label Requirement	Acceptable	Not Acceptable	Comments
General Precautions and Restrictions	X		
Application Instructions	N/A		
Other comments	N/A		

Note : PRB recommends that RD/AD continue to encourage registrants to utilize the recommended label formats and other labeling guidance provided in the Label Review Manual.

"Bujor, Doina"
<dbujor@arvesta.com>
01/13/05 11:18 AM

To Robert Westin/DC/USEPA/US@EPA
cc
bcc
Subject RE: Captan Technical 66330-31

Bob:

This is to inform you that the August 24, 2004 amendment submission for Captan Technical EPA Reg. No. 66330-31 was superseded by an amendment submitted in October 2004. Please let me know if you have any questions.

Best regards,

Doina Bujor
Project Manager, R&RA
Arvesta Corporation
415-778-4876

Robert Westin/DC/USEPA/US

01/03/05 01:52 PM

To "Doina Bujor" <dbujor@arvesta.com>

cc

bcc

Subject Captan Technical 66330-31

Doina: to confirm our phone conversation of Dec. 16, please send me an email asking to voluntarily withdraw the amendment dated August 24 for the subject product.

Thanks.

Bob Westin

US Mail Addrese:
Robert Westin
US EPA
Office of Pesticide Programs
Fungicide Branch (7505C)
Washington, DC 20460

Office - UPS/FedEx/deliveries location:
Robert Westin (Room 267)
Fungicide Branch
US EPA
1801 South Bell Street
Crystal Mall # 2 - Rm 266A
Arlington, VA 22202

phone: 703-305-5721
fax: 703-308-1825
email: westin.robert@epa.gov

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

August 30, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DOIA BUJOR
ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

PRODUCT NAME: CAPTAN TECHNICAL
COMPANY NAME: ARVESTA CORPORATION
EPA FILE SYMBOL: 66330-31
EPA RECEIPT DATE: 08/25/04

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 22, at (703) 305-7044.

Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Resources and Services Division

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

EPA

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[X] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 66330-31	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification [ ] None [ ] Restricted
4. Company/Product (Name) Captan Technical	PM# Team 22	
5. Name and Address of Applicant *(Include ZIP Code)* ARVESTA CORPORATION 100 First Street, Suite 1700 San Francisco, CA 94105 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

[X] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in repsonse to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Cancel the uses on Dichondra

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [X] No	[ ] Yes [X] No	[ ] Yes [X] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[X] Label [ ] Container		[ ]

6. Manner in Which Label Is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Doia Bujor	Project Manager	(415)778-4876

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Doina Bujor	3. Title Project Manager
4. Typed Name Doina Bujor	5. Date August 24, 2004

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Arvesta

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel (415) 536-3480
Fax (415) 284-9883
www.arvesta.com

August 24, 2004

CAPTAN – Label Amendment Applications
EPA Registration No. 66330-28, 66330-26 and 66330-31

Cynthia Giles-Parker (7505C)
Product Manager, Team 22
Fungicide Branch
Office of Pesticide Programs
Document Processing Desk
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, Virginia 22202

Phone No. (703) 308-7740

Dear Ms. Cynthia Giles-Parker:

Arvesta Corporation is submitting a request for labels amendment for the following products: Captan Technical, EPA Reg. No. 66330-31, Captan 50 WP, EPA Reg. No. 66330-26 and Captan 80 WP, EPA Reg. No. 66330-28.

The amendments are made to the last stamped approved labels and consist of removing the uses on Dichondra.

The present submission contains one red lined label and five copies of the final draft label for each of the products, and the application forms (EPA Form 8570-1). Please notify Arvesta of the approval of these amendments request. Please contact me at (415) 778-4876 or dbujor@arvesta.com if you have any questions.

Best regards,

Doina Bujor
Project Manager, R&RA
Arvesta Corporation

Attachments

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
MAY BE FATAL IF INHALED, PROLONGED OR FREQUENTLY REPEATED
SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact – Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments: Alfalfa Beans Beets Broccoli Brussels Sprouts Cabbage Cantaloupe Carrots Cauliflower Cereal Grains --Barley, Rye --Oats --Wheat Clover Collards Corn (field, pop, sweet) Cotton Cowpea	Cucumbers Eggplant Flax Grasses Honeydew Kale Lentils Lespedeza Lettuce Melons Milo Muskmelons Mustard Greens Okra Onions Peanuts Peas Peppers Potato (Seed Piece)	Pumpkins Radish Rape Rutabaga Safflower Sesame Shallots Sorghum Soybeans Spinach Squash Sugar Beets Sunflowers Swiss Chard Tomato Taro (Corm) Trefoil Turnip Watermelon
Foliar Treatment: Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches	Plums (Fresh Prunes) Raspberries Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD/ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers ~~Dichondra~~ Gladiolus Grasses (in lawns and turfs, non-pasturing areas)	Flowering Plants Roses

Soil:
Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints	Plastics	Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

NOTICE TO BUYER & USER:

CONDITIONS OF SALE

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.
3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 4, 2004

Ms. Doina Bujor
Project Manager
Registration and Regulatory Affairs
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan – Revised Confidential Statement of Formula dated 11/20/00

Registration: Captan Technical (EPA Reg. No. 66330-31)

Dear Ms. Bujor:

The Agency has reviewed the revised Confidential Statement of Formula dated 11/22/00 for EPA Reg. No. 66330-31 and it is deemed acceptable. A copy of the Agency's review is enclosed for your records.

Sincerely,

Karen Jones

Karen Jones, Review Manager
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

DATE OUT: 03/NOV/04

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [ ]; MUP [ ]; EUP [x]
BARCODE No.: 310027 **EPA RECEIVED DATE:** 10/27/04
Product Name: Captan Technical **Reg./File Symbol No.** 66330-31
COMPANY NAME: Arvesta Corporation (Tomen Agro, Inc.) **Action Code:** 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)

TO: Karen Jones, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this submission, Avesta Corporation has requested for a review of their revised Confidential Statement of Formula (basic formulation dated 11/22/00), in support of the reregistration of EPA Reg. No. **66330-31.**

FINDINGS:

The revised CSF contains information that are acceptable to support this product. The nominal concentration of the active ingredient agrees with that on the draft label, meeting PR Notice 91-2. The upper and lower certified limits on the active ingredient and the upper limits on the impurities are acceptable as per 40 CFR 158.175(b)(2).

CONCLUSIONS:

The CSF for the basic formulation, dated 11/20/00, are acceptable to support the reregistration of EPA Reg. No. 66330-31.

M.R. Piansay and Central File (EPA Reg. No. 66330-31)
7508C:SRRD:PRB:CM-2: M.R.P.: (03/NOV/04):703-308-8063:<66330-31>

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

October 29, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DOINA BUJOR
ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

PRODUCT NAME: CAPTAN TECHNICAL
COMPANY NAME: ARVESTA CORPORATION
EPA FILE SYMBOL: 66330-31
EPA RECEIPT DATE: 10/27/04

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 22, at (703) 305-7618.

Sincerely,

J. Wrice

Front End Processing Staff
Information Services Branch
Information Resources and Services Division

Receipt for Section 3

S: 769768

Regulatory Type: Product Registration - Section 3

Resubmission: Yes No

Application Type: Amendment

Fee For Service: Yes No

Company: 66330 ARVESTA CORPORATION

Print Letter

Enter More Information

Risk Manager: Registration Division, Risk Management Team 22

Product #: 66330-31 Product Name: CAPTAN TECHNICAL

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 26-Oct-2004 OPP Rec'vd Date: 27-Oct-2004

Front End Date: 28-Oct-2004 Risk Manager Send Date:

Receipt Content

Fast Track: New Ingredient:

Receipt Description:

New Ingredient Request Date:

New Ingredient Received Date:

Form A: Signature Date: Form B: Signature Date:

NON – FEE

Arvesta

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
www.arvesta.com

October 26, 2004

Document Processing Desk
ATTN: Karen Jones (SRRD/PRB)
U.S. Environmental Protection Agency
Office of Pesticide Programs (7508C)
Room 266A, Crystal Mall
1801 South Bell Street
Arlington, VA 22202
Tel: 703-308-0136

Via FedEx Overnight

Subject: CAPTAN RED Label Submissions – Additional Labels
6) CAPTAN Technical – EPA Reg. No. 66330-31
7) CAPTEVATE 68 WDG Fungicide – EPA Reg. No. 66330-48
8) CAPTAN Technical – EPA Reg. No. 66330-54

Dear Ms. Jones:

Arvesta Corporation is submitting the following additional labels to be reviewed under RED: CAPTAN Technical – EPA Reg. No. 66330-31, CAPTEVATE 68 WDG Fungicide – EPA Reg. No. 66330-48 and CAPTAN Technical – EPA Reg. No. 66330-54. The following documents are part of the present submission:

- Form 8570-1 (Notice of Registration Amendment) – for all 3 products
- Form 8570-29 (Certification with Respect to Citation of Data) – for all 3 products
- Form 8570-4 (Confidential Statement of Formula) – for all 3 products
- Form 8570-27 (Formulator Exemption Statement) only for CAPTAN Technical – EPA Reg. No. 66330-54
- Labeling: 1 redlined/draft copy and 5 clean copies – for all 3 products
- Authorization Letter

Please also note that we request that a fee waiver be granted for this submission as it is driven by the RED.

Thank you for your continued assistance in this matter. If you have any questions, feel free to call me at (415) 536-3474 or email at mcarlos@arvesta.com or Ms. Doina Bujor, Senior Chemist/CAPTAN Project Manager at (415) 778-4876 or email at dbujor@arvesta.com.

Best regards,

Marissa N. Carlos
Senior Technical Assistant
Registrations and Regulatory Affairs

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

INGREDIENTS:	By Wt
ACTIVE INGREDIENTS:	
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb.)

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE.
MAY BE FATAL IF INHALED. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the

	poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER
Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact Arvesta Corporation, San Francisco, CA 94105, telephone 866-761-9397.

Only for formulation into a fungicide for the following use(s):
Wettable powder formulations must prohibit aerial application on their end-use product labels unless packaged in water soluble packets.

Seed Treatments:		
Alfalfa	Cucumbers	Pumpkins
Beans	Eggplant	Radish
Beets	Flax	Rape
Broccoli	Grasses	Rutabaga
Brussels Sprouts	Honeydew	Safflower
Cabbage	Kale	Sesame
Cantaloupe	Lentils	Shallots
Carrots	Lespedeza	Sorghum
Cauliflower	Lettuce	Soybeans
Cereal Grains	Melons	Spinach
--Barley, Rye	Milo	Squash
--Oats	Muskmelons	Sugar Beets
--Wheat	Mustard Greens	Sunflowers
Clover	Okra	Swiss Chard
Collards	Onions	Tomato
Corn (field,	Peanuts	Taro (Corm)
pop, sweet)	Peas	Trefoil
Cotton	Peppers	Turnip

Cowpea	Potato (Seed Piece)	Watermelon
Foliar Treatment: Almonds Apples Apricots Blueberries	Cherries Grapes Nectarines Peaches	Plums (Fresh Prunes) Raspberries Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD/ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Gladiolus Grasses (in lawns and turfs, non-pasturing areas)	Flowering Plants Roses

Soil:
Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints	Plastics	Adhesives

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

NOTICE TO BUYER & USER:

CONDITIONS OF SALE

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. **ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR**

REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for re-registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicants/Registrants Name, Address, and Telephone Number ARVESTA CORPORATION, 100 FIRST ST., STE. 1700, SAN FRANCISCO, CA 94105	EPA Registration Number/File Symbol 66330-31
Active Ingredient(s) and/or representative test compound(s) CAPTAN	Date OCTOBER 26, 2004
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crops, terrestrial non-food crops, greenhouse non-food crops	Product Name CAPTAN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulators Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for re-registration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for re-registration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or re-registration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or re-registration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of its receipt by or delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Doina Bujor	October 26, 2004	DOINA BUJOR, Sr. Chemist/Project Manager

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

EPA

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[ ] Amendment
[X] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 66330-31	2. EPA Product Manager CYNTHIA GILES-PARKER	3. Proposed Classification [X] None [ ] Restricted
4. Company/Product (Name) CAPTAN TECHNICAL	PM# TEAM 22	
5. Name and Address of Applicant *(Include ZIP Code)* ARVESTA CORPORATION 100 FIRST STREET, SUITE 1700 SAN FRANCISCO, CA 94105 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in repsonse to Agency letter dated _____
[ ] "Me Too" Application.
[X] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Changes per amended RED request.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [X] No	[ ] Yes [X] No	[ ] Yes [X] No	[ ] Metal [X] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[X] Label [ ] Container		[ ]

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
DOINA BUJOR	Sr. Chemist/Project Manager	(415) 778-4876

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Doina Bujor	3. Title Sr. Chemist/Project Manager
4. Typed Name DOINA BUJOR	5. Date October 26, 2004

MAKHTESHIM
A G A N
of
North America
Inc.

Fed Ex

Friday, March 05, 2004

Ms. Cynthia Giles-Parker, Acting Chief
Fungicide Branch, US Environmental Protection Agency
Office of Pesticide Programs, Registration Division (7505C)
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Giles-Parker,

Makhteshim-Agan of North America Inc. ("**Makhteshim**") is issuing this letter of access on behalf of Arvesta Corporation ("**Arvesta**") in support of a registration.

Subject to the terms hereof, Makhteshim authorizes the US Environmental Protection Agency (US EPA) to cite Makhteshim's registration data on Merpan Technical (Captan Technical) (Reg. No. 11678 – 1) for registration purposes by Arvesta for the product, Captan Technical in the USA. This authorization to EPA to consider our data is extended to Arvesta solely in connection with registration purposes agreed upon by Makhteshim and Arvesta, regarding the product Captan Technical. It does not authorize Arvesta and its employees or any person other than EPA personnel to have access to the said Makhteshim data.

This authorization is not to be extended or transferred to any other applicant unless stipulated in writing by Makhteshim.

This authorization is not to be construed as an authorization by Arvesta to use said data directly or indirectly in support of any subsequent registration application without the express written consent by Makhteshim.

Sincerely
Makhteshim-Agan of North America Inc.

A.Eimanis
Manager Regulatory Affairs

Cc: Ms. Doina Bujor, Arvesta
Mr. Musa Givon, President, MANA
Mr. Ephi Gur, MANA
Dr. Tali Ehrlich, MCW

551 Fifth Avenue, Suite 1100, New York, NY 10176
Tel: 212-661-9800 Fax: 212-661-9038 / 9043

Arvesta

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel (415) 536-3480
Fax (415) 284-9883
www.arvesta.com

July 11, 2003

Dennis McNeilly (7505C)
Product Manager, Team 22
Fungicide Branch
Office of Pesticide Programs
Document Processing Desk
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Phone No. (703) 308-6742

Re: CAPTAN TECHNICAL REG. NO. 66330-31 – FINAL PRINTED LABEL

Dear Mr. McNeilly:

Enclosed is the final printed label for CAPTAN TECHNICAL, EPA Registration Number 66330-31 containing the changes required by EPA when the label amendment request was approved. These changes are:

- The comma was replaced by a period on the first page after "MAY BE FATAL IF INHALED"
- Under PESTICIDE STORAGE AND DISPOSAL:
  - The main title was changed to "STORAGE AND DISPOSAL"
  - The "STORAGE" subheading was changed to read "PESTICIDE STORAGE"
  - The entire box was moved ahead of "DIRECTION FOR USE"

Please contact me at (415) 778-4876 or dbujor@arvesta.com if you have any questions.

Best regards,

Doina Bujor
Project Manager, R&RA
Arvesta Corporation

Attachments

CAPTAN TECHNICAL

Arvesta

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS.

ACTIVE INGREDIENTS:	By Wt.
*CAPTAN	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
Total	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No. 66330-91 EPA Est. No. 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
MAY BE FATAL IF INHALED. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS

	FIRST AID
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IN ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.
Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL 1-800-228-5635 EXTENSION 174.
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Net: _____ Lbs. _____ Kgs.

Made in the U.S.A.
LABEL NUMBER 20163-E BULK BAG

Manufacturer:
ARVESTA CORPORATION
100 First Street, Suite 1700
San Francisco, CA 94105

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product.

For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3460.

Only for formulation into a fungicide for the following uses:

Seed Treatments:

Alfalfa	Corn (field, pop, sweet)	Muskmelon	Shallot
Beans	Cotton	Mustard Greens	Sorghum
Beets	Cowpea	Okra	Soybeans
Broccoli	Cucumber	Onions	Spinach
Brussels Sprouts	Eggplant	Peanuts	Squash
Cabbage	Flax	Peas	Sugar Beets
Cantaloupe	Grasses	Peppers	Sunflower
Carrot	Honeydew	Potato (Seed Piece)	Swiss Chard
Cauliflower	Kale	Pumpkins	Tomato
Cereal Grains	Lemon	Radish	Taro (Cerm)
— Barley, Rye	Lespedeza	Rape	Trefoil
— Oats	Lettuce	Rutabaga	Turnip
— Wheat	Melons	Safflower	Watermelon
Clover	Mint	Sesame	
Colards			

Foliar Treatments:

Almonds	Blueberries	Nectarines	Raspberries
Apples	Cherries	Peaches	Strawberries
Apricots	Grapes	Plums (Fresh Prunes)	

Post-Harvest Dip:

Apple	Cherries	Pears

Pre-Plant Root Dip:
Peaches

NON-FOOD/ORNAMENTALS:

Azaleas	Carnations	Dichondra	Flowering Plants
Begonias	Chrysanthemums	Gladiolus	Roses
Camellias	Conifers	Grasses (in lawns and turfs, non-pastured areas)	

Soil:
Seed beds and greenhouse bench treatment

INDOOR, INDUSTRIAL USES:

Paints	Plastics	Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta. ARVESTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.
3. Critical and unforeseeable factors beyond Arvesta's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt.
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. MAY BE FATAL IF INHALED. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Made in U. S. A.

ARVESTA CORPORATION
100 First Street, Suite 1700
San Francisco, CA 94105

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER
Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in a cool, dry place. Protect from excessive heat.
Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact – Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments:		
Alfalfa	Cucumbers	Pumpkins
Beans	Eggplant	Radish
Beets	Flax	Rape
Broccoli	Grasses	Rutabaga
Brussels Sprouts	Honeydew	Safflower
Cabbage	Kale	Sesame
Cantaloupe	Lentils	Shallots
Carrots	Lespedeza	Sorghum
Cauliflower	Lettuce	Soybeans
Cereal Grains	Melons	Spinach
--Barley, Rye	Milo	Squash
--Oats	Muskmelons	Sugar Beets
--Wheat	Mustard Greens	Sunflowers
Clover	Okra	Swiss Chard
Collards	Onions	Tomato
Corn (field,	Peanuts	Taro (Corm)
pop, sweet)	Peas	Trefoil
Cotton	Peppers	Turnip
Cowpea	Potato (Seed Piece)	Watermelon
Foliar Treatment:		
Almonds	Grapes	Plums (Fresh Prunes)
Apples	Nectarines	Raspberries
Apricots	Peaches	Strawberries
Blueberries		
Cherries		

Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

Non-Food/Ornamentals: Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Grasses (in lawns and turfs, non-pasturing areas)	Flowering Plants Roses

Soil: Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints	Plastics	Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

NOTICE TO BUYER AND USER:
CONDITIONS OF SALE:

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY.

GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 1 2003

Doina Bujor
Project Manager, R&RA
Arvesta Corporation
100 First Street
Suite 1700
San Francisco, CA 94105

Subject: Captan Technical
EPA Reg. No. 66330-31
Your amendment dated January 29, 2003

Dear Ms Bujor:

The revised subject label that you submitted on March 25, 2003 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

First page: change the comma after "MAY BE FATAL IF INHALED" to a period.

PESTICIDE STORAGE AND DISPOSAL:

Change main title to "STORAGE AND DISPOSAL"

Change subheading from "STORAGE" to "PESTICIDE STORAGE"

Move the entire box ahead of "DIRECTIONS FOR USE" on page 3.

A stamped copy of the label is enclosed for your records. Please submit one (1) copy of the final printed label before you release the product for shipment.

Additional label changes may be required in product specific reregistration, e.g., use on turf may be restricted as discussed in the Captan RED

If you have any questions, please call Robert Westin at (703) 305-5721.

Sincerely,

Dennis McNeilly
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
MAY BE FATAL IF INHALED, PROLONGED OR FREQUENTLY REPEATED
SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 1 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 66330-31

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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Seed Treatments:		
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Beans	Eggplant	Radish
Beets	Flax	Rape
Broccoli	Grasses	Rutabaga
Brussels Sprouts	Honeydew	Safflower
Cabbage	Kale	Sesame
Cantaloupe	Lentils	Shallots
Carrots	Lespedeza	Sorghum
Cauliflower	Lettuce	Soybeans
Cereal Grains	Melons	Spinach
--Barley, Rye	Milo	Squash
--Oats	Muskmelons	Sugar Beets

--Wheat Clover Collards Corn (field, pop, sweet) Cotton Cowpea	Mustard Greens Okra Onions Peanuts Peas Peppers Potato (Seed Piece)	Sunflowers Swiss Chard Tomato Taro (Corm) Trefoil Turnip Watermelon
Foliar Treatment: Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches	Plums (Fresh Prunes) Raspberries Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD/ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Grasses (in lawns and turfs, non-pasturing areas)	Flowering Plants Roses

Soil:
Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints	Plastics	Adhesives

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NOTICE TO BUYER & USER:

CONDITIONS OF SALE

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2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.
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PESTICIDE STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Arvesta

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
www.arvesta.com
Tel: (415) 536-3480, Fax: (415) 284-9884, email mcarlos@arvesta.com

MARISSA N. CARLOS
Senior Technical Assistant, Registrations & Regulatory Affairs

March 25, 2003

Mr. Robert Westen
Fungicide Division, (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202
Tel: (703) 305-7740

Via FedEx

Subject: CAPTAN TECHNICAL (EPA Reg. No. 66330-31)
Label Amendment Submission Following Our January 29, 2003 Letter

Dear Mr. Westen:

This submission is further to your conversation of today with Ms. Doina Bujor regarding the label for the product:

CAPTAN TECHNICAL
EPA Reg. No.: 66330-31
Active Ingredient: Captan

Enclosed, per your request are five clean copies of the label. The following are corrections made to the previously sent label dated January 29, 2003:

1) Change heading from STORAGE AND DISPOSAL to PESTICIDE STORAGE AND DISPOSAL (page 5).
2) Add missing paragraphs from CONDITIONS OF USE (page 5). The paragraphs were hidden under the Pesticide Storage and Disposal text box when printed, however, as per attached new label, this has been corrected.

Thank you for your assistance in the amendment of this registration. If you have further questions regarding this submission or Captan in general, please contact the Arvesta project manager, Ms. Doina Bujor at (415) 778-4876 or email at dbujor@arvesta.com .

Best regards,

Enclosures.

Cc: Ms. Linda Arrington, Ombudsman
Registration Division (7505C)
US EPA

Ms. Ann Prichard, Pesticide Registration Branch and
Ms. Victoria Hornbaker, Registration Specialist
CA DPR
1001 I Street
Sacramento, CA 95812
(916) 324-3915

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
Captan*	~~88.0~~ 91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	~~10.0~~ 6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
~~HARMFUL~~ MAY BE FATAL IF INHALED, ~~ABSORBED THROUGH SKIN OR SWALLOWED~~, PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

~~STATEMENT OF PRACTICAL TREATMENT~~

~~FIRST AID:~~

~~IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.~~

~~**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.~~

~~**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.~~

~~**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.~~

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. ~~Harmful if swallowed or inhaled when handling. May cause allergic skin reactions.~~ Do not get in eyes or on clothing. Wear goggles or face shield ~~when handling~~. ~~Harmful~~ May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. ~~Avoid contact with skin and clothing.~~ Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further

manufacturing into end-use pesticide products, contact – Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

1. FOOD USE SITES

Seed Treatments: Alfalfa Beans Beets Broccoli Brussels Sprouts Cabbage Cantaloupe Carrots Cauliflower Cereal Grains --Barley, Rye --Oats --Wheat Clover Collards Corn (field, pop, sweet) Cotton Cowpea	Cucumbers Eggplant Flax Grasses Honeydew Kale Lentils Lespedeza Lettuce Melons Milo Muskmelons Mustard Greens Okra Onions Peanuts Peas Peppers Potato (Seed Piece)	Pumpkins Radish Rape Rutabaga Safflower Sesame Shallots Sorghum Soybeans Spinach Squash Sugar Beets Sunflowers Swiss Chard Tomato Taro (Corm) Trefoil Turnip Watermelon
Fruit & Nut Crops: **Foliar Treatment:** Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) Raspberries Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD ~~USE SITES/ORNAMENTALS:~~

~~Ornamental Plants:~~		
Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers ~~(ornamental only)~~ Dichondra Gladiolus Grasses (in lawns and turfs, non-pasturing areas)	~~Ornamental~~ Flowering Plants Roses ~~Soil (lawn seedbeds and Greenhouse Bench)~~

~~**Indoor, Industrial Uses:**~~ **Soil:**

Seed beds and greenhouse bench treatment

Indoor/Industrial:		
Paints	Plastics	Adhesives

3. ~~**Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**~~

4. ~~**Uses for experimental purposes that are in compliance with USEPA requirements.**~~

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE:

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

ZENECA

ZENECA Ag Products
PO Box 751
Wilmington
Delaware 19897

Telephone (302) 886-1000
Telex 4945649
Fax (302) 886-1553

FEBRUARY 9, 1993

Mr. Hoyt L. Jamerson
Minor Use Officer
Emergency Response and Minor Use Section
Registration Support Branch
Registration Division (H7505C)
OPP, EPA
Washington, DC 20460

Dear Mr. Jamerson:

RE: Letter of Authorization for Captan

This is your authorization to refer to any data in your files for CAPTAN® in support of the petition from IR-4 for the establishment of a residue tolerance for CAPTAN® use in raspberries and blackberries production.

Please do not reveal any information within the CAPTAN® file that may be deemed confidential to the office of IR-4.

This authorization does not imply any waiver or abdication of our rights in these data, or any right to use these data by any party for any other use than specified herein.

Sincerely,

Dana E. Enyedy
Regulatory Product Manager

cc: William L. Biehn, Ph.D.
IR-4 Project Associate Coordinator
Office of IR-4
Cook College, P.O. Box 231
Rutgers, The State University of New Jersey
New Brunswick, NJ 08903-0231

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 66330-31	2. EPA Product Manager	3. Proposed Classification [ ] None [ ] Restricted
4. Company/Product (Name) Captan Technical	PM# 22	
5. Name and Address of Applicant *(Include ZIP Code)* Arvesta Corporation 100 First Street, Suite 1700 San Francisco, CA 94105 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

- [ ] Amendment - Explain below.
- [x] Resubmission in response to Agency letter dated 08/28/2002
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [x] Paper [ ] Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container		[x] On the label

6. Manner in Which Label Is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Doina Bujor	Project Manager	(415) 778-4876

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature *Doina Bujor*	3. Title Project Manager
4. Typed Name Doina Bujor	5. Date January 29, 2003

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

6

Arvesta

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel (415) 536-3480
Fax (415) 284-9883
www.arvesta.com

Maria
301
5628992

January 29, 2003

Captan Technical
Label Amendment Application
EPA Registration No. 66330-31

Richard Keigwin
Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
Document Processing Desk
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Phone No. (703) 305-5363

Dear Mr. Keigwin:

The present is a re-submission of the Captan Technical amended label as requested in the to E.P.A. letter dated August 28, 2002. Arvesta Corporation submitted a response to EPA later on October 8, 2002. The following changes were made to the label based on your recommendations:

- The First Aid Statement have been moved to the first page and will appear on the front panel of the final label;
- The sensitization precautionary statement "Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals" has been added after the "May be fatal if inhaled" statement;
- The new uses recently added to our label were removed. The new uses will be added at a later date

This submission package contains one copy of the red lined label, five (5) copies of draft amended label and the application form (EPA Form 8570-1). Please notify Arvesta of approval of this amendment request.

Please contact me at (415) 778-4876 or dbujor@arvesta.com if you have any questions.

Best regards,

Doina Bujor
Project Manager, R&RA
Arvesta Corporation

Attachments

CC: (Letter only)

Linda Arrington, Ombudsman
Registration Division (7505C)
U.S. EPA

Ann Prichard
Pesticide Registration Branch
Department of pesticide Regulation
P.O. Box 4015
Sacramento, CA 95812-4015

Victoria Hornbaker
Registration Specialist, CDPR

OCT 18 2002

I, Cynthia Giles-Parker, Product Manager, Team 22, Fungicide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticide and Toxic Substances, United States Environmental Protection Agency (EPA), certify that the pesticide product(s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further the recipient of this letter is on notice that the status of the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

EPA REGISTRATION NO.	PRODUCT NAME
66330-31	Captan Technical

/S/
Cynthia Giles-Parker
Product Manager (PM22)
Fungicide Branch
Registration Division 7505C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 28 2002

Annette M. Flores
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

Dear Ms. Flores:

Subject: EPA Registratration No. 66330-31
Captan Technical
Label Review request by California DPR
Letter dated June 6, 2002

The Agency has review the attached label submitted by Cal DPR with the subject letter. We are unable to accept this label for the following reasons:

1. The First Aid statements must appear on the front panel of all products assigned to toxicity category I.

2. Add the sensitization precautionary statement to the front panel of your label immediately after the "May be fatal if inhaled" statement.

3. For the Captan Reregistration Eligibility Document (RED), the Agency reassessed numerous tolerances for Captan which are identified in the tolerance reassessment chart in the RED. The Agency has not established the tolerances for many of the uses identified, therefore we are unable to accept labeling with these additional uses at this time. Once the Agency has proposed and finalized these regulations, then you will be able to request these changes through an amendment. You must delete reference to all new uses/crops added to your label (i.e. bluegrass, caneberries, etc.)

Please submit revised labels incorporating the changes listed above.

Sincerely,

/S/

Cynthia Giles-Parker
Product Manager (922)
Fungicide Branch
Registration Division (7505C)

Linda Arrington, Ombudsman
Registration Division (7505C)

Ann Prichard
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015

Department of Pesticide Regulation Registration Branch Physical Address: 1001 I Street, Sacramento, CA 95814
Mailing Address: P.O. Box 4015, Sacramento CA 95812-4015

FAX

Date: 06/11/2002
Number of Pages to Follow: 25

To: Linda Arrington

Phone:
Fax No.: (703) 305-6920

From: Ann Prichard
California Department of Pesticide Regulation

Phone: (916) 324-3931
Fax No.: (916) 324-5872

REMARKS: ☐ Urgent ☐ For Your Review ☐ Reply ASAP ☐ Please Comment

Linda - I am faxing you a copy of a label amendment for Arvesta Corporation's Captan Technical, EPA Reg. No. 66330-31 under the label amendment project. The hard copy was mailed last Friday.

dpr

Department of Pesticide Regulation

Paul E. Helliker
Director

Gray Davis
Governor

Winston H. Hickox
Secretary, California Environmental Protection Agency

Richard

June 6, 2002

Ms. Linda Arrington, Ombudsman
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Dear Ms. Arrington:

Submission of a Label Under the U.S. EPA/DPR Label Revision Project

Enclosed for your review and approval is an amended label for Arvesta Corporation's (formerly Tomen Agro, Inc.) Captan Technical, EPA Reg. No. 66330-31.

Enclosed are:

- Four copies of the proposed amended label (one copy with revisions highlighted);
- A copy of the currently approved federal product label (accepted with comments, April 20, 1998);
- U.S. Environmental Protection Agency (U.S. EPA) data review dated January 10, 2001 indicating that the precautionary statement on the product label should read "Corrosive. Causes irreversible eye damage. May be fatal if inhaled...."
- U.S. EPA letter to Tomen Agro, Inc., dated December 21, 2001, requiring certain amendments to the product label; and
- DPR toxicology data review, dated April 9, 2002, indicating that the product is Toxicity Category I for eye irritation, Toxicity Category II for acute inhalation, and Toxicity Category III for acute dermal toxicity.

Arvesta Corporation voluntarily agreed to amend their product label to add the word "Corrosive" in the Precautionary Statements section of the product label. In addition, Arvesta Corporation amended the precautionary statement and first aid statement on their product label in compliance with U.S. EPA's December 21, 2001 letter.

Please return a stamped approved copy of the revised label at your earliest convenience to:

Attn: Ann Prichard
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015
Fax: (916) 324-5872

If you have any questions, please call me at (916) 324-3931 or contact me by e-mail at *aprichard@cdpr.ca.gov*.

Sincerely,

Ann M. Prichard
Senior Environmental Research Scientist
Pesticide Registration Branch

Enclosures

cc: Ms. Victoria Hornbaker (w/ enclosures)

JUN-11-2002 09:47 CA DEPT PEST REG. 1 916 324 5872 P.03/26

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER
CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
MAY BE FATAL IF INHALED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

RECEIVED
MAY 2 4 2002
BY PEST/REGISTRATION
ID#_____

JUN-11-2002 09:47 CA DEPT PEST REG. 1 916 324 5872 P.04/26

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

JUN-11-2002 09:47 CH DEPT PEST REG. 1 916 324 5872 P.05/26

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact – Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments:	Cucumbers	Pumpkins
Alfalfa	Eggplant	Radish
Barley	Flax	Rape
Beans (snap, cowpeas,	Grasses	Rutabaga
lentils, soybeans)	Kale	Rye
Beets (table and sugar)	Lespedeza	Safflower
Bluegrass	Lettuce	Sesame
Broccoli	Melons (cantaloupe,	Shallots
Brussel Sprouts	honeydew, watermelon,	Sorghum (milo and hulled)
Cabbage	and musk melons)	Spinach
Carrots	Milo	Squash
Cauliflower	Mustard Greens	Sunflowers
Clover	Oats	Swiss Chard
Collards	Okra	Tomato

Corn (field, and sweet) Cotton	Onions Peanuts Peas Peppers Potato (Seed Piece)	Trefoil Turnip Wheat
Foliar Treatment: Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) Caneberries (raspberries, blackberries, dewberries) Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Turf (sod farm and golf course)	Flowering Plants Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints Coatings	Plastics	Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liabilty resulting form handling, storage, and use of this product.

TomenAgro

100 First Street, Suite 1610
San Francisco, CA 94105
(415) 536-3474 FAX: (415) 284-9884

Facsimile Transmission

TO:		FROM:	
Company:	CADPR	Name:	Shih-Lo Lee
Attention:	Kathy Wynn	cc:	File: Cap/USA/CA
Fax#:	916-324-1919		
Number of pages: (including cover)	6	Date:	10-26-2000

Subject: Captan technical – EPA stamped label

Attached is the copy of current EPA stamped label. (total 5 pages).

We will submit a new label after we receive it back from our recent submission (Aug. 2000) to the EPA.

Shih-Lo Lee

Phone: 415-536-3467
Fax : 415-284-9884

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY
THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENT:
*CAPTAN..... 88.0%
Related Derivatives.....2%
INERT INGREDIENTS:.....10.0%
Total.....100.0%
*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No.: 66330-31

Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN
DANGER
CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105

ACCEPTED
with COMMENTS
In EPA Letter Dated
APR 20 1998
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. For the pesticide registered under EPA Reg. No.
66330-31

STATEMENT OF PRACTICAL TREATMENT

FIRST AID: -
IF IN EYES: - Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.
IF SWALLOWED: - Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, no not give anything by mouth and do not induce vomiting.
IF ON SKIN: - Wash with plenty of soap and water. Get medical attention
IF INHALED: -Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with skin and clothing. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480. Only for formulation into a fungicide for the following uses:

1. FOOD USE SITES

Seed Treatments:

Alfalfa
Beans
Beets
Broccoli
Brussels Sprouts
Cabbage
Cantaloupe
Carrots
Cauliflower
Cereal Grains
--Barley, Rye
--Oats
--Wheat
Clover
Collards
Corn (field, pop, sweet)
Cotton
Cowpea
Cucumbers
Eggplant
Flax
Grasses
Honeydew
Kale
Lentils
Lespedeza
Lettuce
Melons
Milo
Muskmelons
Mustard Greens
Okra
Onions
Peanuts
Peas
Peppers
Potato (Seed Piece)
Pumpkins
Radish
Rape
Rutabaga
Safflower
Sesame
Shallots
Sorghum
Soybeans
Spinach
Squash
Sugar Beets
Sunflowers
Swiss Chard
Tomato
Taro (Corm)
Trefoil
Turnip
Watermelon

Fruit & Nut Crops:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Pears (post harvest only)
Plums (Fresh Prunes)
Raspberries
Strawberries

NON-FOOD USE SITES:

Ornamental Plants:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers (ornamental only)
Dichondra
Gladiolus
Grasses (in lawns and turfs, non-pasturing areas)
Ornamental Flowering Plants
Roses
Soil (lawn seedbeds and Greenhouse Bench)

Indoor, Industrial Uses:

Paints Plastics Adhesives

3. **Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**

4. **Uses for experimental purposes that are in compliance with USEPA requirements.**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, f allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE: 1. Tomen Agro, Inc. warrants that this product conforms to the chemical description on the label
and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED,**

INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 10, 2001

MEMORANDUM:

Subject: EPA Reg. No.: 66330-31/ Captan Technical
DP Barcode: D271562

EPA Reg. No.: 66330-32/ Captan Technical-F
DP Barcode: D271563

EPA Reg. No.: 66330-34/ Captan 90 Dust Base
DP Barcode: D271566
Case No.: 0120

From: Ann Hanger, Environmental Protection Specialist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

A. Hanger
MJP

To: Karen Jones, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL
# of pages ▸ 4
To Ann Protchard
Dept/Agency CA EPA
Fax # 916 324 5872
From Linda Arrington
Phone # 703 235 5446
Fax # 703 305 6920
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

FORMULATION FROM EPA Reg. No. 66330-31 LABEL:

	% by wt.
Active Ingredient(s):	
Captan	91.5%
Related Derivatives	2.0%
Other Ingredient(s):	6.5%
Total	100.0%

FORMULATION FROM EPA Reg. No. 66330-32 LABEL:

	% by wt.
Active Ingredient(s):	
Captan	93.4%
Related Derivatives	2.0%

FORMULATION FROM EPA Reg. No. 66330-34 LABEL:

	% by wt.
Active Ingredient(s):	
Captan	93.0%
Related Derivatives	2.0%
Other Ingredient(s):	5.0%
Total	100.0%

BACKGROUND: In the 8 month response to the Captan RED, the registrant submitted acute toxicity studies performed on technical captan to support the acute toxicity requirements for their technical products, EPA Reg. Nos. 66330-31, 66330-32, and 66330-34, all listed in batch 1 according to the Captan RED. The submitted MRID's are as follows: 452882-01, 452882-02, 452882-03, and 400214-01. A waiver was requested for the primary eye irritation and skin sensitization guidelines. In accordance with the Captan RED, the registrant is accepting a category I classification for the primary eye irritation guideline and a positive skin sensitization classification for the subject products. The submitted studies were conducted on EPA Reg. No. 66330-31 by Springborn Laboratories and Huntingdon Life Sciences with the exception of MRID 400214-01 which was conducted on EPA Reg. No. 66330-34 by Stauffer Chemical Company.

Ann, 452882-01 thru 03 submitted 12/20/02

400214-01 submitted 12/9/86

RECOMMENDATIONS:

- The waiver requests for primary eye irritation and skin sensitization are acceptable. As per the Captan RED, the subject products will be assigned a category I for primary eye irritation and will be classified as positive skin sensitizers.

- The acute oral, acute dermal, acute inhalation, and primary dermal irritation studies are acceptable.

The acute toxicity requirements for EPA Reg. Nos. 66330-31, -32, and -34 are satisfied.

The acute toxicity profile for EPA Reg. Nos. 66330-31, 66330-32, and 66330-34 is currently:

Acute Oral	IV	Acceptable
Acute Dermal	IV	Acceptable
Acute Inhalation	II	Acceptable
Primary Eye	I	Waived
Primary Dermal	IV	Acceptable
Skin Sensitization	Sensitizer	Waived

PRECAUTIONARY LABELING

ID #: 066330-00031 CAPTAN TECHNICAL
ID #: 066330-00032 CAPTAN TECHNICAL-F
ID #: 066330-00034 CAPTAN 90 DUST BASE

SIGNAL WORD: DANGER PELIGRO

HAZARDS TO HUMANS AND DOMESTIC ANIMALS*:

Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Do not get in eyes or on clothing. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-XXX-XXXX for emergency medical treatment information.

The following "Note to Physician" statement is required for the subject product:

NOTE TO PHYSICIAN; Probable mucosal damage may contraindicate the use of gastric lavage.

Note to PM/CRM/Registrant: The proposed label should contain a "Note to Physician" which addresses the eye irritation toxicity. The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological

effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

USER SAFETY RECOMMENDATIONS:

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove contaminated clothing and wash clothing before reuse.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 21 2001

Annette M. Flores
Tomen Agro, Inc.
100 First Street, Suite 1610
San Francisco, CA 94105

RECEIVED
JAN 29 2002
BY PEST/REGISTRATION
ID# 36968

Dear Ms. Flores:

Subject: EPA Registration Number 66330-31
Captan Technical
Label review request by California DPR

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is not acceptable. The following changes are required for this product:

1. Revise the Precautionary Statements to include the following language:

"Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Removed contaminated clothing and wash clothing before reuse."

2. The First Aid Statements must be revised to include the statement below. Place this statement in close proximity to the First Aid statements:

"NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage."

This review does not preclude your compliance with the label amendment requirements in the Captan Reregistration Eligibility Document.

JUN-11-2002 09:51 CA DEPT PEST REG. 1 916 324 5872 P.19/26

Please revise your label for this product to include the above language. Submit five (5) copies of the revised label for Agency review.

Sincerely,

/S/

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

cc: Ann Pritchard
Department of the California Environmental Protection Agency
Pesticide Registration Branch
Department of Pesticide Regulation

Linda Arrington, Ombudsman
Registration Division
Environmental Protection Agency, 7505C

TO: Victoria Hombaker, **Registration Specialist**
Pesticide Registration Branch

FROM: Medical Toxicology Branch **Date:** 04/09/02

PRODUCT REGISTRATION RECOMMENDATION SHEET

Formulated Product Name: CAPTAN TECHNICAL
Chemical Code #: 1) 104, 2) 90104
EPA Reg. #: 66330-31
Document #: 103-132, -300, -333 to -335
Company Name: ARVESTA CORPORATION

ID #: 192838
SB 950 #: 1) 206, 2) NA

RECOMMENDATION:

Submitted for a Section 3 Label Amendment.

The data reviewed are adequate for a complete acute toxicological evaluation.

The product label adequately identifies the acute toxicity hazards indicated by the data reviewed.

Acceptance of the amended label is recommended.

Mark T. Hansen
Associate Toxicologist

4/10/02
Date

Thomas Kellner
Staff Toxicologist

4/10/02
Date

JUN-11-2002 09:51 CA DEPT PEST REG. 1 916 324 5872 P.21/26

TO--File: Registration
Branch: Registration

Registration Specialist: Victoria Hornbaker

FROM--Medical Toxicology

DATA PACKAGE SUMMARY AND RECOMMENDATION SHEET

Active Ingredient: 1) Captan, 2) Captan Related Derivatives
Formulated Product Name: CAPTAN TECHNICAL
Formulation: 1) 91.5%, 2) 2% Related Derivatives, 3) Inerts
Chemical Code #:) 104, 2) 90104
EPA Reg. #: 66330-31
Document #: 103-132, -300, -333 to -335
Company Name: ARVESTA CORPORTATION

ID #: 192838
SB 950 #: 1) 206, 2) NA

SUMMARY ("One-liners" from each study worksheet, significant information not mentioned in worksheets, other pertinent information for ongoing review of registration. Attach additional sheets if needed):

The registrant, ARVESTA CORPORTATION, was formerly known as TomenAgro, Inc.

The differences in formulation between the test articles and the subject product are of minimal toxicological concern.

Regarding systemic toxicity, the Captan Technical (a. i.: 91.66% Captan) data is more reflective of the acute toxicity of the subject product than the Captan Technical (a. i.: 88% Captan).

Captan Technical (a. i.: 91.66% Captan) Acute Toxicity Categories

Acute Oral Toxicity (LD_{50})	IV
Acute Dermal Toxicity (LD_{50})	IV
Acute Inhalation Toxicity (LC_{50})	II
Primary Eye Irritation	Not submitted*
Primary Dermal Irritation	Not submitted*
Dermal Sensitization	Not submitted*

*: See conclusions

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Captan Technical (a. i.: 91.66% Captan) Acute Toxicity Studies

Acute Oral Toxicity (LD_{50})

103-333; 186012; Acute Oral Toxicity; 811; rat; Springborn Laboratories, Inc., Spencerville, OH; Project #: 3527.8; 12/11/00; Captan Technical (a. i.: 91.66% captan); Lot #: PJE0805LS; 5.0 g/kg; single, oral-gavage dose, with a 14-day observation period; 5 test subjects/sex/dose level; mortality: none; clinical signs: soft, mucoid, and/or few feces, dark material around eyes, nose and/or mouth, congested breathing, slight fecal/urine staining, unkempt appearance, hypoactivity, rales, rough coat, distended abdomen, and/or clear ocular discharge; body-weight gain was positive in all, except for weight loss exhibited by 1/5 F from Day 7 to 14; necropsy: no gross abnormalities reported, except in 1/10 subjects exhibiting abscesses on the epididymides, clear fluid cyst on the oviducts, and lung foci; Toxicity Category IV; LD_{50} (M/F) > 5.0 g/kg; **Acceptable.** (Hansen, 04/04/02)

Acute Dermal Toxicity (LD_{50})

103-334; 186013; Acute Dermal Toxicity; 812; rabbit; Springborn Laboratories, Inc., Spencerville, OH; Project #: 3527.9; 12/11/00; Captan Technical (a. i.: 91.66% captan); Lot #: PJE0805LS; 5.0 g/kg (moistened with approximately 0.63 mL deionized water/g test article); single, dermal exposure, with an occlusive wrap and a 14-day observation period; 5 test subjects/sex/dose level; mortality: none; clinical signs: decreased defecation, soft and/or mucoid stools, clear, ocular discharge, and dark material around mouth; yellow staining and dermal irritation at application site, erythema (grade 1, 2), edema (grade 1), desquamation, and superficial lightening (grade 1, 2); body-weight gain was positive throughout study, except for 1/5 F exhibiting losses from Days 0 to 7; necropsy: ovarian cysts in 4/5 F, but not thought to be treatment related, and scabbing on hip; Toxicity Category IV; LD_{50} (M/F) > 5.0 g/kg; **Acceptable.** (Hansen, 04/04/02)

Acute Inhalation Toxicity (LC_{50})

103-335; 186014; Acute Inhalation Toxicity; 813; rat; Huntingdon Life Sciences Ltd, East Milstone, NJ; Project #: 00-5439; 11/16/00; Captan Technical (a. i.: 91.66% captan); Lot #: PJE0805LS; milled: 0.0720, 0.648, and 2.28 mg/L, unmilled 0.668 mg/L (gravimetric concentration); nominal concentration: milled - 0.0720, 0.21 mg/L, 0.648, 1.4 mg/L, and 2.28, 4.5 mg/L, unmilled - 0.668, 5.1 mg/L; mean MMAD (GSD): milled - 0.0720, 2.55 (2.(a. i.: 91.66% Captan) 59) µm, 0.648, 2.61 (2.37) µm, 2.28, 2.98 (2.39) µm; unmilled - 0.668, 7.40 (2.48) µm; single, 4-hour, nose-only inhalation exposure, with a 14-day observation period; 5 test subjects/sex/dose level; mortality (M/F): milled - 0.0720, 1/5, 0/5; 0.648, 4/5; 2.28, 5/5, unmilled - 0.668, 0/5; clinical signs: **(exposure), labored breathing (milled - 0.648 and 2.28 mg/L, unmilled - 0.668 mg/L) and poor** condition (milled - 2.28 mg/L); (post-exposure - survivors), clear or red nasal discharge, dried red material on facial area, yellow material on ventral fur, chromodacryorrhea, excessive salivation, labored breathing, gasping, moisture and/or tan material on fur, decreased defecation, and moist rales; body-weight decreased in most test subject exposed to milled test article during the 1st week post-exposure, while body-weight gain was positive throughout in subjects exposed to unmilled test article; necropsy: (decedents), red lungs, red mucinous material in nasal cavity, and fluid and/or

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abnormal contents in the trachea, lungs, and nasal turbinates; (survivors), alopecia on forepaws; LC_{50} (M/F) = 0.272 (0.159 - 0.466) mg/L, LC_{50} (M) = 0.220 (0.084 - 0.579) mg/L, LC_{50} (F) = 0.322 (0.156 - 0.664) mg/L; Toxicity Category II; **Acceptable.** (Hansen, 04/05/02)

Primary Eye Irritation
Not submitted

Primary Dermal Irritation
Not submitted

Dermal Sensitization
Not submitted

Captan Technical (a.i.: 88% Captan) Acute Toxicity Categories

Acute Oral Toxicity (LD_{50})	IV
Acute Dermal Toxicity (LD_{50})	III
Acute Inhalation Toxicity (LC_{50})	III
Primary Eye Irritation	I
Primary Dermal Irritation	IV
Dermal Sensitization	Unacceptable*

*: See conclusions

Captan Technical (a.i.: 88% Captan) Acute Toxicity Studies

Acute Oral Toxicity (LD_{50})
103-132; 051680; Acute Oral Toxicity; 811; rat; Stauffer Chemical Company, Richmond Toxicology Laboratory, Richmond, CA; Report #:T-11474, 05/22/84; Captan Technical; 10 test subjects/sex/dose level; 5.0 g/kg (suspended in corn oil); single, oral-gavage dose; mortality (M/F): 2/10, 1/10; clinical signs: mild to moderate depression, ptosis, diarrhea, salivation, lacrimation, stained fur, piloerection, red-stained muzzle, anogenital stains, alopecia, bloated appearance, thin appearance, ataxia, dyspnea, easy agitation, and chromodacryorrhea, with all signs except for alopecia clearing in the survivors within 6 days; necropsy: (decedents), reddened lungs, dark-edged and/or dark liver, bloated gastrointestinal tract, test article-like fluid in the stomach, and darkened kidneys; (survivors), no internal abnormalities; LD_{50} (M/F) > 5.0 g/kg; Category IV; **Acceptable.** (Kahn, 12/08/86; updated, Corlett, 07/12/94)

Acute Dermal Toxicity (LD_{50})
103-132; 051682; Acute Dermal Toxicity; 812; rabbit; Stauffer Chemical Company, Richmond Toxicology Laboratory, Richmond, CA; Report #:T-11474, 05/22/84; Captan Technical; 5 test

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subjects/sex/dose level; 2.0 g/kg; single, 24-hour dermal exposure, covered; mortality: none; clinical signs: none reported; necropsy: no gross abnormalities reported; LD_{50} (M/F) > 2.0 g/kg; Category III; **Acceptable**. (Kahn, 12/08/86; updated, Corlett, 07/13/94)

Acute Inhalation Toxicity (LC_{50})

103-300; 151734; Acute Inhalation Toxicity; 813; rat; Stauffer Chemical Co., Stauffer Environmental Health Center, Inhalation Facility, Farmington, CT; Report No.: T-11933; 04/02/85; Captan Technical; 10 test subjects/sex/group; 0.56, 0.71, and 1.39 mg/L (gravimetric), MMAD (GSD): 5.70 (2.98), 5.40 (3.40), 2.95 (2.14) μm, respectively, single, 4-hour whole-body exposure; mortality (M/F): 0.56, 3/10, 1/10, 0.71, 5/10, 1.39, 10/10, 8/10; clinical signs: labored breathing, red/brown or yellow stains around mouth and head, chromorhinorrhea, bulging eyes, chromodacryorrhea, prostrate posture, yellow-stained ventral surface; necropsy: mottled red lungs, stomach filled with frothy contents, mottled liver and kidneys, and eyes cloudy white; LC_{50} (95% confidence limits): (M) = 0.72 (0.54 - 0.95) mg/L, (F) = 0.87 (0.67 - 1.13) mg/L; Toxicity Category III; **Acceptable**. (Moore, 01/13/97)

Primary Eye Irritation

103-300; 151733; Primary Eye Irritation; 814; rabbit; Stauffer Chemical Co., Richmond Toxicology Laboratory, Richmond, CA; Report No.: T-6858; 07/11/80; Captan Technical; 6 test subjects/treatment level (unrinsed); 0.1 g/eye; clinical signs: irritation scores were not reported; however, corneal opacity was evident in 3/6 through Day 28; Toxicity Category I; **Acceptable**. (Moore, 01/13/97)

Primary Dermal Irritation

103-132; 051681; Primary Dermal Irritation; 815; rabbit; Stauffer Chemical Company, Richmond Toxicology Laboratory, Richmond, CA; Report #: T-11474, 05/22/84; Captan Technical; 6 test subjects/treatment level; 0.5 g/site; single, 4-hour exposure, covered with a 72-hour observation period; clinical signs: no erythema or edema at any time during study; Category IV; **Acceptable**. (Kahn, 12/08/86; updated, Corlett, 07/13/94)

Dermal Sensitization

103-300; 164360; Study was **unacceptable** (Captan [a. i.: 88%] study in the guinea pig animal model tested by Magnusson-Kligman method was inconclusive [guinea pig maximization test; see WH&S memo from 06/20/00; I. D. No.: 183281; DPR record No.: 164360; "Captan: Skin Sensitization to the Guinea Pig." Study was deemed unacceptable because report lacked: (1) Induction dermal erythema/edema results, (2) Range-finding dermal erythema/edema results, and (3) Negative scores were not reported.]).

CONCLUSIONS: Are data adequate to support registration?

The Captan Technical (a. i.: 91.66% Captan) acute oral, dermal, and inhalation toxicity studies are acceptable.

Captan Technical (a. i.: 91.66% Captan) primary eye and dermal irritation and dermal sensitization studies were not submitted.

The Captan Technical (a.i.: 88% Captan) acute oral, dermal, and inhalation toxicity, primary eye and dermal irritation studies are acceptable.

A Captan Technical (a.i.: 88% Captan) dermal sensitization study was unacceptable. However, since the proposed label contained skin sensitization precautionary language, an acceptable dermal sensitization study is not required at this time.

RECOMMENDATIONS: What type of registration action is being requested? In case of ongoing registration, register or do not register? What other specific studies or data are requested?

Submitted for a Section 3 Label Amendment.

The data reviewed are adequate for a complete acute toxicological evaluation.

The product label adequately identifies the acute toxicity hazards indicated by the data reviewed.

Acceptance of the amended label is recommended.

Mark C Hansen — 4/10/02
Associate Toxicologist — **Date**

Thomas Kellner — 4/10/02
Staff Toxicologist — **Date**

dpr

Department of Pesticide Regulation

Paul E. Helliker
Director

Gray Davis
Governor

Winston H. Hickox
Secretary, California Environmental Protection Agency

June 6, 2002

Ms. Linda Arrington, Ombudsman
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Dear Ms. Arrington:

Submission of a Label Under the U.S. EPA/DPR Label Revision Project

Enclosed for your review and approval is an amended label for Arvesta Corporation's (formerly Tomen Agro, Inc.) Captan Technical, EPA Reg. No. 66330-31.

Enclosed are:

- Four copies of the proposed amended label (one copy with revisions highlighted);
- A copy of the currently approved federal product label (accepted with comments, April 20, 1998);
- U.S. Environmental Protection Agency (U.S. EPA) data review dated January 10, 2001 indicating that the precautionary statement on the product label should read "Corrosive. Causes irreversible eye damage. May be fatal if inhaled...."
- U.S. EPA letter to Tomen Agro, Inc., dated December 21, 2001, requiring certain amendments to the product label; and
- DPR toxicology data review, dated April 9, 2002, indicating that the product is Toxicity Category I for eye irritation, Toxicity Category II for acute inhalation, and Toxicity Category III for acute dermal toxicity.

Arvesta Corporation voluntarily agreed to amend their product label to add the word "Corrosive" in the Precautionary Statements section of the product label. In addition, Arvesta Corporation amended the precautionary statement and first aid statement on their product label in compliance with U.S. EPA's December 21, 2001 letter.

Please return a stamped approved copy of the revised label at your earliest convenience to:

Attn: Ann Prichard
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015
Fax: (916) 324-5872

If you have any questions, please call me at (916) 324-3931 or contact me by e-mail at *aprichard@cdpr.ca.gov*.

Sincerely,

Ann Prichard

Ann M. Prichard
Senior Environmental Research Scientist
Pesticide Registration Branch

Enclosures

cc: Ms. Victoria Hornbaker (w/ enclosures)

highlighted

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
Captan*	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100%

✓ CSF

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER
CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
MAY BE FATAL IF INHALED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS ✓ location

MADE IN THE U.S.A.

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

RECEIVED
MAY 2 4 2002
BY PEST/REGISTRATION
ID#_____

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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Only for formulation into a fungicide for the following use(s):

Seed Treatments:	Cucumbers	Pumpkins
Alfalfa	Eggplant	Radish
Barley	Flax	Rape
Beans (snap, cowpeas,	Grasses	Rutabaga
lentils, soybeans)	Kale	Rye
Beets (table and sugar)	Lespedeza	Safflower
Bluegrass	Lettuce	Sesame
Broccoli	Melons (cantaloupe,	Shallots
Brussel Sprouts	honeydew, watermelon,	Sorghum (milo and hulled)
Cabbage	and musk melons)	Spinach
Carrots	Milo	Squash
Cauliflower	Mustard Greens	Sunflowers
Clover	Oats	Swiss Chard
Collards	Okra	Tomato

Corn (field, and sweet) Cotton	Onions Peanuts Peas Peppers Potato (Seed Piece)	Trefoil Turnip Wheat
Foliar Treatment: Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) Caneberries (raspberries, blackberries, dewberries) Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

RED

NON-FOOD ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Turf (sod farm and golf course) lawns non-pasturing	Flowering Plants Roses Soil (lawn seed beds greenhouse bench)

Soil:
lawn seed bed?
Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints Coatings	Plastics	Adhesives

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

"Lee, Shih-Lo"
<slee@arvesta.com>

05/22/02 10:08 AM

To: Karen Jones/DC/USEPA/US@EPA, Marianne Lewis/DC/USEPA/US@EPA, Mark Perry/DC/USEPA/US@EPA
cc: Cynthia Giles-Parker/DC/USEPA/US@EPA, Kylie Rothwell/DC/USEPA/US@EPA
Subject: RE: Captan Technical Reg. #66330-31

Dear Karen:

Yes, those changes were made based on the meeting with Kylie Rothwell, Marianne Lewis and Mark Perry.

We were instructed by Mark Howard to submit our Isotox Seed Treater (F) Reg #66330-19 (delete non-supported crops)to Mr. Dana Pilitt and requested for the 30-day comment period to expedite the review. I was not sure whether we should use the same statement for Captan technical (This label was needed by California Dept of Pesticide Registration). Please forward it to Marianne and Mark.

By the way we have completed the "Attrition Test" using ASTM 728-97 for Captan 80 WDG Reg #66330-29 that was requested by Mark and Marianne. The % fine (-325 mesh) analyzed was 0.74% and 0.78% from duplicate test. Marianne and Mark indicated that if we conducted and passed this test, then they would approved our Captan 80WDG Label (An updated version is on its way to be sent to your attention).

Best Regards.

Shih-Lo

-----Original Message-----
From: Jones.Karen@epamail.epa.gov [mailto:Jones.Karen@epamail.epa.gov]
Sent: Wednesday, May 22, 2002 6:24 AM
To: slee@arvesta.com
Subject: Captan Technical Reg. #66330-31

Dear Shih-Lo:

I have received the revised labels for the captan technical. Are these labels being submitted in response to your meeting with Marianne Lewis (Toxicologist)? Or should these labels also be sent to PM22? You also requested a 30-day comment period instead of 180-days. At this time, the Product Reregistration Branch does not have a comment period on labels. As stated previously, PRB will not conduct a review of the captan labels until the Captan RED is amended or other issues are resolved.

If these labels are being submitted in response to your meeting with Marianne Lewis, I will forward it to her for review; however, a complete label assessment will not be conducted until the captan issues are resolved.

Best regards,
Karen Jones
Product Reregistration Branch
SRRD/OPP
US EPA
(703) 308-8047

Karen Jones
05/22/02 09:16 AM

To: slee@arvesta.com
cc:
cc:
Subject: Captan Technical Reg. #66330-31

Dear Shih-Lo:

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Karen Jones
Product Reregistration Branch
SRRD/OPP
US EPA
(703) 308-8047

Arvesta

100 First Street, Suite 1700
San Francisco, CA 94105
Phone (415) 536-3480
Fax (415) 284-9884

May 15, 2002

Ms. Karen Jones (703-308-8047)
Special Review & Reregistration Division
Office of Pesticide Program
1921 Jefferson Davis Highway
Arlington, VA 22202

Subject: Captan Technical Label/EPA Reg. No. 66330-31

Dear Karen:

Enclosed are 5 copies of our amended Captan Technical Label. We have changed the precautionary statement (pages 1 and 3) to "May be fatal if inhaled".

Arvesta Corporation would like to waive the 180-day comment period and request for a 30-day comment period instead.

If you have any questions, please contact me at 415-536-3467 or via e-mail (slee@arvesta.com).

Sincerely,

Shih-Lo Lee
Project Manager
Registrations & Regulatory Affairs
Arvesta Corporation

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EPA Est. No.: 66330-OH-1

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~~HARMFUL~~ MAY BE FATAL IF INHALED~~, ABSORBED THROUGH SKIN OR SWALLOWED~~

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MADE IN THE U.S.A.

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100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

~~STATEMENT OF PRACTICAL TREATMENT~~

~~FIRST AID:~~
~~IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.~~

~~**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.~~

~~**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.~~

~~**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.~~

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HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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ENVIRONMENTAL HAZARDS

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~~1. FOOD USE SITES~~

Seed Treatments: Alfalfa Barley Beans (snap, cowpeas, lentils, soybeans) Beets (table and sugar) Bluegrass Broccoli Brussel Sprouts Cabbage ~~Cantaloupe~~ Carrots Cauliflower ~~Cereal Grains~~ ~~Barley, Rye~~ ~~Oats~~ ~~Wheat~~ Clover Collards Corn (field, ~~pop~~ and sweet) Cotton ~~Cowpea~~	Cucumbers Eggplant Flax Grasses ~~Honeydew~~ Kale ~~Lentils~~ Lespedeza Lettuce Melons (cantaloupe, honeydew, watermelon, and musk melons) Milo Muskmelons Mustard Greens Oats Okra Onions Peanuts Peas Peppers Potato (Seed Piece)	Pumpkins Radish Rape Rutabaga Rye Safflower Sesame Shallots Sorghum (milo and hulled) ~~Soybeans~~ Spinach Squash ~~Sugar Beets~~ Sunflowers Swiss Chard Tomato ~~Taro (Corm)~~ Trefoil Turnip ~~Watermelon~~ Wheat
~~**Fruit & Nut Crops:**~~ **Foliar Treatment:** Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) ~~Raspberries~~ Caneberries (raspberries, blackberries, dewberries) Strawberries
Post-Harvest Dip: Apple	Cherries	Pears

Pre-Plant Root Dip: Peaches		

NON-FOOD ~~USE SITES~~/ORNAMENTALS:

~~Ornamental Plants:~~ Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers (~~ornamental only~~) Dichondra Gladiolus ~~Grasses (in lawns and turfs, non-pasturing areas)~~ Turf (sod farm and golf course)	~~Ornamental~~ Flowering Plants Roses ~~Soil (lawn seedbeds and Greenhouse Bench)~~

~~**Indoor, Industrial Uses:**~~ **Soil:**

Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints Coatings	Plastics	Adhesives

3. ~~**Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**~~

4. ~~**Uses for experimental purposes that are in compliance with USEPA requirements.**~~

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Rebuttal

"Lee, Shih-Lo"
<slee@arvesta.com>

03/30/02 10:17 AM

To: Kylie Rothwell/DC/USEPA/US@EPA, Cynthia Giles-Parker/DC/USEPA/US@EPA
cc: Betty Shackleford/DC/USEPA/US@EPA, Karen Jones/DC/USEPA/US@EPA
Subject: Captan Labels: Technical Material and a 80WG formula

Dear ALL:

I will be in Washington DC next week from Wednesday to Friday. I have meetings set on Thursday April 4 in the morning and early afternoon (Mr. Eugene Wilson and Bayer people). I should be available for Wednesday and Friday all day. If it is possible, I would like to visit you to discuss the following issues of Captan:

1. Captan Technical Label (66330-31): Precaution Statement regarding inhalation.
2. Captan caneberry including blackberry, raspberry and dewberry use.
3. Captan 80 WG Label (66330-29): This is a WG formulation that would give minimum exposure via inhalation route.
4. Captan Oyster Study Waiver Conference Call with Makhteshim.
5. Arvesta's Captan Import Tolerance Petition linked with Captan Re-classification.

Best Regards.

Shih-Lo
Arvesta Corporation (formerly Tomen Agro, Inc.)

Phone:415-536-3467
E-mail: slee@arvesta.com

Janet
Add Raspberry
Blackberries, dewberries
New, 330
561556

Arvesta
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105
Tel (415) 536-3480
Fax (415) 284-9883
www.arvesta.com

March 13, 2002

Ms. Cynthia Giles-Parker
PM Team 22
Office of Pesticide Programs (7504C)
United States Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Phone: (703) 305-7740

SUBJECT: Captan Technical (Reg. No. 66330-31) Label Amendment

Dear Ms. Giles-Parker:

Per your request, enclosed are the following documents:

1. EPA Form No. 8570-34, Certification with Respect to Citations of Data.
2. Revised EPA Form No. 8570-35, Data Matrix.
3. Five copies of revised EPA Reg. No. 66330-31, Captan Technical labels according to DPR's instructions.
4. One copy of the most recent approved EPA Reg. No. 66330-31, Captan Technical label.
5. One copy of a letter from Zeneca to an EPA Minor Use Officer permitting IR-4 to cite Captan Technical data for establishment of tolerance for raspberries, blackberries and dewberries.

If you have any questions, please contact Shih-Lo Lee directly by phone: (415) 536-3467 or e-mail: slee@arvesta.com

415-778-4774

Sincerely,

Christine Navarra
Technical Assistant
Arvesta Corporation (Formerly TomenAgro, Inc)

Enclosure
cc: Files: Captan/USA/R
D. Byrne, S.L. Lee

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~~**Fruit & Nut Crops:**~~ **Foliar Treatment:** Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) ~~Raspberries~~ Caneberries (raspberries, blackberries, dewberries) Strawberries
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Pre-Plant Root Dip: Peaches		

NON-FOOD ~~USE SITES~~/ORNAMENTALS:

~~Ornamental Plants:~~ Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers ~~(ornamental only)~~ Dichondra Gladiolus ~~Grasses (in lawns and turfs, non-pasturing areas)~~ Turf (sod farm and golf course)	~~Ornamental~~ Flowering Plants Roses ~~Soil (lawn seedbeds and Greenhouse Bench)~~

~~**Indoor, Industrial Uses:**~~ **Soil:**

Seed beds and greenhouse bench treatment

Indoor/Industrial: Paints Coatings	Plastics	Adhesives

3. ~~**Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**~~

4. ~~**Uses for experimental purposes that are in compliance with USEPA requirements.**~~

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE:

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	**By Wt**
Captan*	~~88.0~~ 91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	~~10.0~~ 6.5%
TOTAL	100%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg. (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER
CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

ARVESTA CORPORATION
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

~~STATEMENT OF PRACTICAL TREATMENT~~

~~FIRST AID:~~
~~IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.~~

~~IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.~~

~~IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.~~

~~IF ON SKIN: Wash with plenty of soap and water. Get medical attention.~~

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call call poison control center or doctor immediately for treatment advice. • Have person sip glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL:
(800) 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. ~~Harmful if swallowed or inhaled when handling. May cause allergic skin reactions.~~ Do not get in eyes or on clothing. Wear goggles or face shield ~~when handling~~. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. ~~Avoid contact with skin and clothing.~~ Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact – Arvesta Corporation, San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

~~1. FOOD USE SITES~~

Seed Treatments: Alfalfa Barley Beans (snap, cowpeas, lentils, soybeans) Beets (table and sugar) Bluegrass Broccoli Brussel Sprouts Cabbage ~~Cantaloupe~~ Carrots Cauliflower ~~Cereal Grains~~ ~~Barley, Rye~~ ~~Oats~~ ~~Wheat~~ Clover Collards Corn (field, ~~pop~~ and sweet) Cotton ~~Cowpea~~	Cucumbers Eggplant Flax Grasses ~~Honeydew~~ Kale ~~Lentils~~ Lespedeza Lettuce Melons (cantaloupe, honeydew, watermelon, and musk melons) Milo ~~Muskmelons~~ Mustard Greens Oats Okra Onions Peanuts Peas Peppers Potato (Seed Piece)	Pumpkins Radish Rape Rutabaga Rye Safflower Sesame Shallots Sorghum (milo and hulled) ~~Soybeans~~ Spinach Squash ~~Sugar Beets~~ Sunflowers Swiss Chard Tomato ~~Taro (Corm)~~ Trefoil Turnip ~~Watermelon~~ Wheat
~~**Fruit & Nut Crops:**~~ **Foliar Treatment:** Almonds Apples Apricots Blueberries Cherries	Grapes Nectarines Peaches Pears (post harvest only)	Plums (Fresh Prunes) ~~Raspberries~~ Caneberries (raspberries, blackberries, dewberries) Strawberries
Post-Harvest Dip: Apple	Cherries	Pears
Pre-Plant Root Dip: Peaches		

NON-FOOD ~~USE SITES~~/ORNAMENTALS:

~~Ornamental Plants:~~		
Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers ~~(ornamental only)~~ Dichondra Gladiolus ~~Grasses (in lawns and turfs, non-pasturing areas)~~ Turf (sod farm and golf course)	~~Ornamental~~ Flowering Plants Roses ~~Soil (lawn seedbeds and Greenhouse Bench)~~

~~**Indoor, Industrial Uses:**~~ **Soil:**

Seed beds and greenhouse bench treatment

Indoor/Industrial:		
Paints Coatings	Plastics	Adhesives

3. ~~**Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**~~

4. ~~**Uses for experimental purposes that are in compliance with USEPA requirements.**~~

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This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE:

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta Corporation. ARVESTA CORPORATION DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABLITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA CORPORATION DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Arvesta Corporation's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, damage cause by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting form handling, storage, and use of this product.

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENT:
*CAPTAN..... 88.0%
Related Derivatives.....2%
INERT INGREDIENTS:.....10.0%
Total.....100.0%
*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105

ACCEPTED
with COMMENTS
In EPA Letter Dated
APR 20 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 66330-31

STATEMENT OF PRACTICAL TREATMENT

FIRST AID: -
IF IN EYES: - Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.
IF SWALLOWED: - Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, no not give anything by mouth and do not induce vomiting.
IF ON SKIN: - Wash with plenty of soap and water. Get medical attention
IF INHALED: -Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with skin and clothing. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480. Only for formulation into a fungicide for the following uses:

1. FOOD USE SITES

Seed Treatments:

Alfalfa
Beans
Beets
Broccoli
Brussels Sprouts
Cabbage
Cantaloupe
Carrots
Cauliflower
Cereal Grains
--Barley, Rye
--Oats
--Wheat
Clover
Collards
Corn (field, pop, sweet)
Cotton
Cowpea
Cucumbers
Eggplant
Flax
Grasses
Honeydew
Kale
Lentils
Lespedeza
Lettuce
Melons
Milo
Muskmelons
Mustard Greens
Okra
Onions
Peanuts
Peas
Peppers
Potato (Seed Piece)
Pumpkins
Radish
Rape
Rutabaga
Safflower
Sesame
Shallots
Sorghum
Soybeans
Spinach
Squash
Sugar Beets
Sunflowers
Swiss Chard
Tomato
Taro (Corm)
Trefoil
Turnip
Watermelon

Fruit & Nut Crops:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Pears (post harvest only)
Plums (Fresh Prunes)
-
Raspberries
Strawberries

NON-FOOD USE SITES:

Ornamental Plants:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers (ornamental only)
Dichondra
Gladiolus
Grasses (in lawns and turfs, non-pasturing areas)
Ornamental Flowering Plants
Roses
Soil (lawn seedbeds and Greenhouse Bench)

Indoor, Industrial Uses:

Paints Plastics Adhesives

3. **Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**

4. **Uses for experimental purposes that are in compliance with USEPA requirements.**

STORAGE AND DISPOSAL

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NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE: 1. Tomen Agro, Inc. warrants that this product conforms to the chemical description on the label
and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED,**

INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

Arvesta

100 First Street, Suite 1700
San Francisco, CA 94105
Phone (415) 536-3467
Fax (415) 284-9884

March 5, 2002

Office of Pesticide Program (7508C)
Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Kylie Rothwell (703-308-8055)
cc: Ms. Cythia Giles-Parker (703-305-7740)
cc: Ms. Karen Jone (703-308-8047)

RE: Captan Technical (66330-31) Label Precautionary Statement

Dear Kylie:

In response to the Agency's letter dated 12/21/01 regarding label amendment requirements, we believe that the precautionary statements should remain as "Harmful if inhaled" based on the specification of our typical production of Captan technical. Our typical particle size of Captan technical is 11 microns.

Please refer to the attached "Discussion Paper on Captan Technical Label Precautionary Statement". If you have any questions, please contact me by e-mail (slee@arvesta.com) or phone (415-536-3467)

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/R
DPR (Ms. Victoria Hornbaker)

Arvesta

100 First Street, Suite 1700
San Francisco, CA 94105
Phone (415) 536-3467
Fax (415) 284-9884

March 5, 2002

Discussion Paper

Captan Technical (EPA Registration No. 66330-31) Label Precautionary Statement

RE – Acute Inhalation Study Result (4 hr nose only) from non-milled and milled Captan technical material

Arvesta (Tomen Agro, Inc.) conducted an acute inhalation (rat) study with Captan technical in 2000 to fulfill the RED data requirement for confirmation purpose. Based on EPA's inhalation guideline the particle size for the study should be reduced to less than 4 microns. The laboratory failed to reduce the particle size of Captan technical to 4 microns after many attempts with a laboratory scale mill. The particle sizes of Captan technical remained unchanged at 7.4 microns.

We then went to a special manufacturing plant and asked them to reduce the particle size using an industrial air-milling machine. The Captan technical material was ground through the air-mill twice. The particle size was reduced from 7.4 to 2.7 microns after two cycles. Since we have both 7.4 micron and 2.7micron test materials available, we decided to conduct an inhalation study with both particle sizes. As expected, the milled-Captan was more toxic than the non-milled:

The Acute inhalation (rat) 4 hr nose only:

Non-milled (7.4 microns) LC 50 >0.668 mg/l;
Milled (2.7 microns) LC 50 = 0.272 mg/l

The mean particle size of our typical production Captan technical is around 11 microns and under normal conditions it cannot be reduced to any finer particles; therefore the inhalation classification and label precautionary text should be based on our normal production particle size (>7.4 micron) not on the reduced twice particle sizes (2.7 microns).

Attached are particle size distributions of 5 random production batches of Captan technical material.

Shih-Lo Lee
Project Manager
R & RA
Arvesta Corporation (Tomen Agro, Inc.)
Attached: Particle Size Distribution of Five batch Captan Technical Material.

Pages 146-150 Manufacturing process information may be entitled to confidential treatment

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 21 2001

Annette M. Flores
Tomen Agro, Inc.
100 First Street, Suite 1610
San Francisco, CA 94105

Dear Ms. Flores:

Subject: EPA Registration Number 66330-31
Captan Technical
Label review request by California DPR

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is not acceptable. The following changes are required for this product:

1. Revise the Precautionary Statements to include the following language:

"Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Removed contaminated clothing and wash clothing before reuse."

2. The First Aid Statements must be revised to include the statement below. Place this statement in close proximity to the First Aid statements:

"NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage."

This review does not preclude your compliance with the label amendment requirements in the Captan Reregistration Eligibility Document.

Please revise your label for this product to include the above language. Submit five (5) copies of the revised label for Agency review.

Sincerely,

/S/

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

cc: Ann Pritchard
Department of the California Environmental Protection Agency
Pesticide Registration Branch
Department of Pesticide Regulation

Linda Arrington, Ombudsman
Registration Division
Environmental Protection Agency, 7505C

OPP Cynthia FYI No action

MAKHTESHIM
A G A N
of
North America
Inc.

December 20, 2001

Ms. Betty Shackleford
Chief, Reregistration Branch 3
Office of Pesticides Programs (7508C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington DC 20460

Dear Ms. Shackleford:

Subject: Captan Document File Supporting the Threshold Mode of Action (MOA).

Following the Captan Task Force meeting with yourself and other EPA personnel on November 14, 2001 a follow-on meeting dealing with captan's cancer classification was held on November 28, 2001 with Jim Jones, Lois Rossi, Bill Burnam, Ray Kent, Rick Keigwin and Ed Zager. At the conclusion of this meeting, it was requested that we prepare a list of documents that support our position that captan should be classified as a non-genotoxic threshold carcinogen. The purpose of this list is to provide the Agency an estimate of resources needed should a cancer classification evaluation of captan be undertaken.

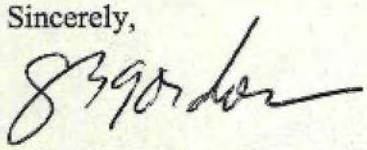
The attached Tables list the studies and documents that we reference in our reclassification document of April 4, 2001 or other documents summarizing the MOA of captan. The quoted titles (Tables 2-8) refer to key components that comprise the MOA. These documents either have been submitted to EPA (MRIDs noted) or are available for submission. Copies of some were provided attendees of the November 28, 2001 meeting. The Tables are annotated at the bottom to provide further background on the cited references or to help clarify the Task Forces' position. We understand that not all documents submitted to the Agency have been reviewed. Estimated times for review therefore often are annotated at 0-2 hr (zero meaning that additional review time is not required). Furthermore, while we note 0-4 hours for review of the papers cited in Table 2, we believe these issues are well established in the scientific community and will require no additional review time.

Our estimate of the hours required to review these data are 12.5 hours per reviewer. This is based on the understanding that HED CARC reviewers are familiar with the issues surrounding the MOA for captan (i.e., "0-2 hr" is considered 0 hr.)

551 Fifth Avenue, Suite 1100, New York, NY 10176
Tel: 212-661-9800 Fax: 212-661-9038 / 9043

Additional time would be required for committee meetings, as required. Finally, we ask that the FIFRA SAP evaluate captan's proposed MOA to further validate our conclusions.

Sincerely,



Elliot B. Gordon, PhD, DABT
Manager, Scientific Affairs
For the Captan Task Force
Comprised of TomenAgro and Makhteshim-Agan of North America Inc.

cc: Ed Zager, Lois Rossi, Bill Burnam, Ray Kent, Rick Keigwin, Jim Jones, and Stephen L. Johnson.
Desmond Byrne, TomenAgro
Ephi Gur, Makhteshim-Agan of North America Inc.
Scott Rawlins, consultant to the Captan Task Force

Tables of Supporting Documents Underlying the Mode of Action for tumor development with continuous doses of captan above the No Effect Level of 60 mg/kg/day.

Table 1. Summary Documents.

Document	**Comment**	**Review Time**
(Piccirillo, 2001) MRID 45391901	This document summarizes the data supporting the MOA for captan and requests that the Agency reclassify captan on the basis of its threshold non-mutagenic action in mice.	4 hr
(Gordon, 2001)	This overview of captan and folpet toxicology includes a summary of the Mode of Action for these fungicides. It also discusses why captan is not an *in vivo* mutagen; why it is not related to captafol; and, why captan presents a low risk from ingestion of residues and no risk from dermal exposure.	0-3 hr
(Gordon, et al., 1994) MRID 43405101	This document summarizes data showing that: Captan is not a genotoxic carcinogen; that a threshold exists for tumors; that captan is not a rat carcinogen; that captan is not structurally related to captafol; and that captan is not a human carcinogen.	0-3 hr

All three summary documents need not be reviewed in detail as the salient features are contained in the latest submitted document (Piccirillo, 2001).

Table 2. "Abnormal high cell proliferation may promote initiated cells to tumors."

Document	**Comment**	**Review Time**
(Butterworth, et al., 1992)	These papers are part of the robust database supporting the concept of proliferative pressure exerting a promoting effect on transformed cells or otherwise inducing or 'capturing' DNA damage.	0 – 4 hr.
(Ledda-Columbano, et al., 1989)		
(Pitot, et al., 1991)		

We believe the issue of high proliferation rates promoting initiated cells is not controversial.

Table 3. "The duodenum is very dynamic with villi renewed every 2-4 days by basal cells deep in the crypts."

Document	Comment	Review Time
(Potten and Loeffler, 1990, Potten, et al., 1990)	These papers review the duodenal cellular architecture and dynamics of villi cell replacement.	0 – 4 hr.
(Potten, et al., 1983)		
(Potten, et al., 1990)		
(Potten and Morris, 1987)		
(Wright and Alison, 1984)		
(Potten, 1978)		

These papers provide the backdrop for understanding the MOA of captan.

Table 4. "Spontaneously initiated cells are resident *in situ* in the mouse duodenum."

Document	**Comment** (CD-1 strain unless otherwise noted)	**Review Time**
(Wong, et al., 1981) MRID 00068076	Adenomas 1/74 (1.4%) males 2/72 (2.8%) females Adenocarcinomas 1/74 (1.4%) males 0/72 (0%) females	0.5 hrs
(Bomhard and Mohr, 1989)	Intestinal tumors, NMRI Strain 9/614 (1.5%) male 2/591 (0.3%) female	--
(Chandra and Frith, 1992)	Adenomas 0/725 (0%) males 0/725 (0%) females Adenocarcinomas 1/725 (0.1%) males 1/725 (0.1%) females	--
(Lang, 1995)	Charles River Technical Bulletin Adenomas 0-2.17% males 0-2.08% females Adenocarcinomas 0-1.18% males 0-2.08% females	--
(Maita, et al., 1988)	Adenomas 2/891 0.2% males 1/890 0.1% females Adenocarcinomas 0/891 0% males 2/890 0.2% females	--
(Ward, et al., 1979)	Additional control data	--
(Rubin, 1985) MRID 259873-259877	Adenomas (B6C3F1 strain) 0/51 (0%) males 1/49 (2%) females	--

These papers establish that spontaneously transformed cells exist in the mouse duodenum.

Table 5. "Captan causes transient local irritation to the duodenum. Continued administration (above the threshold) results in duodenal tumors."

Document	Comment	Review Time
(Allen, 1994) MRID 4339503	Captan causes crypt hyperplasia	0-2 hr
(Tinston, 1995) MRID 43875602	Captan causes hyperplasia of the crypts predominantly in the first 7 cm	0-2 hr
(Tinston, 1996) MRID 43982201	Captan causes villi disruption within 3 days.	0-2 hr
(Pavkov and Thomasson, 1985)	A time-course study showing that 6000 ppm for a minimum of 6 months is necessary to induce tumors	0-2 hr
(Gordon, et al., 2001)	Captan has an extremely short half-life *in vivo*, restricting it to local irritation only.	2 hr

These papers show the histological changes induced by captan. They are central to the MOA. The blood degradation study (Gordon, et al., 2001) is critical to understanding why captan is a local irritant only (non-systemic) and not mutagenic *in vivo*.

Table 6. "Captan is not a rat carcinogen."

Document	Comment	Review Time
(Foster and Elliott, 2000) MRID 45071801	Two instances of tumors associated with captan treatment are shown not to be treatment related.	2 hrs

This document summarizes again the reasons captan is not a carcinogen in rats.

Table 7. "Captan is structurally similar to folpet but not captafol."

Document	Comment	Review Time
(Bernard and Gordon, 2000)	Captafol produces an episulphonium ion that may act as a systemic carcinogen. Captan and folpet do not have this ability and act locally only.	1 hr

EPA no longer asserts captan is similar to captafol so this point (hopefully) is moot.

Table 8. "Captan is not mutagenic *in vivo*."

Document	Comment	Review Time
(Gordon, et al., 2001)	Captan has an extremely short half-life *in vivo*, restricting it to local irritation only.	(2 hr, previously listed)
(Gordon, et al., 2001)	This document summarizes the case showing captan is not an *in vivo* mutagen.	3 hr

This is a key issue for acceptance of the captan MOA. The Agency has, in the past, asked that the Task Force "prove the negative." On the contrary, we cite the collective data that "proves the positive" i.e., that captan induces tumors through a non-genotoxic Mode of Action.

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dpr

Department of Pesticide Regulation

Paul E. Helliker
Director

Gray Davis
Governor

Winston H. Hickox
Secretary, California Environmental Protection Agency

November 9, 2001

Ms. Linda Arrington, Ombudsman
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Dear Ms. Arrington:

Submission of a Label Under the U.S. EPA/DPR Label Revision Project

Enclosed for your review and approval is an amended label for Tomen Agro Inc.'s Captan Technical, EPA Reg. No. 66330-31.

Enclosed for your review are:

- Four copies of the proposed amended label (one copy with revisions highlighted);
- Latest Confidential Statement of Formula;
- A copy of the currently approved federal product label (accepted 4-20-98); and
- The Department of Pesticide Regulation's (DPR's) review of acute toxicity data (5-4-99).

Data on file with DPR indicate that this product presents a Toxicity Category I eye irritation hazard. The current label bears the signal word "Danger" and the precautionary statement "Causes irreversible eye damage." However, the precautionary statement does not include the word "Corrosive."

Tomen Agro Inc. voluntarily agreed to amend their product label to add the word "Corrosive." The proposed label also contains some other minor changes, all of which have been highlighted.

FLEX YOUR POWER! *The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web site at <www.cdpr.ca.gov>.*

Please return a stamped approved copy of the revised label at your earliest convenience to:

Attn: Ann Prichard
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015
Fax: (916) 324-5872

If you have any questions, please call me at (916) 324-3931 or contact me by e-mail at *aprichard@cdpr.ca.gov*.

Sincerely,

Ann Prichard

Ann M. Prichard
Senior Environmental Research Scientist
Pesticide Registration Branch

Enclosures

cc: Ms. Kathy Wynn (w/enclosures)

Proposed label

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
*CAPTAN	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE

HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have product container or label with you when calling a poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE,
CALL 1-800-228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with

skin and clothing. Remove contaminated clothing and separately wash clothing before reuse. May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products contact – Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments:

Alfalfa	Cucumbers	Pumpkins
Barley	Eggplant	Radish
Beans (snap, cowpeas, lentils, soybeans)	Flax	Rape
Beets (table and sugar)	Grasses	Rutabaga
Bluegrass	Kale	Rye
Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
Collards	Peanuts	Swiss Chard
Corn (field, and sweet)	Peas	Tomato
Cotton	Peppers	Trefoil

	Potato (Seed Piece)	Turnip Wheat

Foliar Treatment:

Almonds Apples	Grapes Nectarines	Plums (Fresh Prunes) Caneberries (raspberries, blackberries, dewberries)
Apricots Blueberries Cherries	Peaches	Strawberries

Post-harvest Dip:

Apple	Cherries	Pears

Pre-plant Root Dip:

Peaches

NON-FOOD/ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Turf (sod, farm and golf course)	Flowering Plants Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints Coatings	Plastics	Adhesives

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NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

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Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
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Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
Collards	Peanuts	Swiss Chard
Corn (field, and sweet)	Peas	Tomato
Cotton	Peppers	Trefoil

	Potato (Seed Piece)	Turnip Wheat

Foliar Treatment:

Almonds Apples	Grapes Nectarines	Plums (Fresh Prunes) Caneberries (raspberries, blackberries, dewberries)
Apricots Blueberries Cherries	Peaches	Strawberries

Post-harvest Dip:

Apple	Cherries	Pears

Pre-plant Root Dip:

Peaches

NON-FOOD/ORNAMENTALS:

Azaleas Begonias Camellias Carnations Chrysanthemums	Conifers Dichondra Gladiolus Turf (sod, farm and golf course)	Flowering Plants Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints Coatings	Plastics	Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
*CAPTAN	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE

HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have product container or label with you when calling a poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE,
CALL 1-800-228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with

skin and clothing. Remove contaminated clothing and separately wash clothing before reuse. May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products contact – Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments:

Alfalfa	Cucumbers	Pumpkins
Barley	Eggplant	Radish
Beans (snap, cowpeas, lentils, soybeans)	Flax	Rape
Beets (table and sugar)	Grasses	Rutabaga
Bluegrass	Kale	Rye
Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
Collards	Peanuts	Swiss Chard
Corn (field, and sweet)	Peas	Tomato
Cotton	Peppers	Trefoil

Potato (Seed Piece)
Turnip
Wheat

Foliar Treatment:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Plums (Fresh Prunes)
Caneberries (raspberries, blackberries, dewberries)
Strawberries

Post-harvest Dip:

Apple
Cherries
Pears

Pre-plant Root Dip:

Peaches

NON-FOOD/ORNAMENTALS:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers
Dichondra
Gladiolus
Turf (sod, farm and golf course)
Flowering Plants
Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints
Coatings
Plastics
Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

Current USEPA Accepted Label

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENT:
*CAPTAN..... 88.0%
Related Derivatives.....2%
INERT INGREDIENTS:.....10.0%
Total.....100.0%
*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED.

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105

RECEIVED
MAY 09 2000
BY PEST/REGISTRATION
ID#_____

ACCEPTED
with COMMENTS
In EPA Letter Dated
APR 20 1998
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 66330-31

STATEMENT OF PRACTICAL TREATMENT

FIRST AID: -
IF IN EYES: - Hold eyelids open and flush with a steady. gentle stream of water for 15 minutes. Get medical attention.
IF SWALLOWED: - Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, no not give anything by mouth and do not induce vomiting.
IF ON SKIN: - Wash with plenty of soap and water. Get medical attention
IF INHALED: -Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with skin and clothing. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480. Only for formulation into a fungicide for the following uses:

1. FOOD USE SITES

Seed Treatments:

Alfalfa
Beans
Beets
Broccoli
Brussels Sprouts
Cabbage
Cantaloupe
Carrots
Cauliflower
Cereal Grains
--Barley, Rye
--Oats
--Wheat
Clover
Collards
Corn (field, pop, sweet)
Cotton
Cowpea
Cucumbers
Eggplant
Flax
Grasses
Honeydew
Kale
Lentils
Lespedeza
Lettuce
Melons
Milo
Muskmelons
Mustard Greens
Okra
Onions
Peanuts
Peas
Peppers
Potato (Seed Piece)
Pumpkins
Radish
Rape
Rutabaga
Safflower
Sesame
Shallots
Sorghum
Soybeans
Spinach
Squash
Sugar Beets
Sunflowers
Swiss Chard
Tomato
Taro (Corm)
Trefoil
Turnip
Watermelon

Fruit & Nut Crops:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Pears (post harvest only)
Plums (Fresh Prunes)
Raspberries
Strawberries

NON-FOOD USE SITES:

Ornamental Plants:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers (ornamental only)
Dichondra
Gladiolus
Grasses (in lawns and turfs, non-pasturing areas)
Ornamental Flowering Plants
Roses
Soil (lawn seedbeds and Greenhouse Bench)

Indoor, Industrial Uses:

Paints Plastics Adhesives

3. **Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**

4. **Uses for experimental purposes that are in compliance with USEPA requirements.**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, f allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE: 1. Tomen Agro, Inc. warrants that this product conforms to the chemical description on the label
and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED,**

INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

State of California

Memorandum

To : Peter Leung, Supervisor
Product Review Group
Medical Toxicology Branch

Date : 5/4/99

Place : Sacramento

From : **Department of Pesticide Regulation** - Thomas Moore, Staff Toxicologist
Medical Toxicology Branch

Subject : Request for re-evaluation of the eye irritation hazard presented by Captan Technical

A precautionary labeling discrepancy for the Category I eye irritation hazard presented by exposure to captan technical has been noted. One product is presently registered with DPR for captan technical (Tomen Agro, Inc., EPA Reg. No. 66330-31). Recently, Makhteshim-Agan of North America, Inc. submitted Merpan (Captan) Technical (EPA Reg. No. 11678-1) for registration. The Medical Toxicology Branch reviewed the data cited to support the product's registration (see Product Registration Recommendation Sheet of 1/14/99). The reviewer did not recommend the product's registration because the corrosiveness indicated by the eye irritation data were not adequately identified on the product label. A further review of the eye irritation data on captan technical on file with DPR has confirmed this conclusion.

Three eye irritation studies on the technical were reviewed. In the first study (vol. 103-012, rec. no. 925038), conjunctival redness (grade 2) was noted in the eye of one animal 14 days after treatment (last day of observation) with no indication of corrosiveness. In the second study (provided by the registrant in vol. 103-313, rec. no. 168283), corneal opacity and/or neovascular pannus was noted for 5 of the 6 animals at 21 days after dosing. Similar results were noted for the animals in the third study (vol. 103-300, rec. no. 151733) in which 3 of the 6 animals exhibited corneal opacity at 28 days after dosing.

The registered product from Tomen Agro, Inc., likewise does not adequately identify the corrosiveness indicated by these eye irritation data. Both the product label submitted by Makhteshim-Agan for review and the registered label for the Tomen Agro product have identical precautionary statements. I am requesting that the Tomen Agro product be placed in re-evaluation for adequate labeling of the eye irritation hazard.

D00103>Captanreev

SURNAME Moore | Leung

Department of Pesticide Regulation Registration Branch Physical Address: 1001 I Street, Sacramento, CA 95814
Mailing Address: P.O. Box 4015, Sacramento CA 95812-4015

FAX

Date: 11/14/2001
Number of Pages to Follow: _____

To:	From:
Linda Arrington	Ann Prichard
	California Department of Pesticide Regulation
Phone: (703) 305-5446	Phone: (916) 324-3931
Fax No.: (703) 305-6920	Fax No.: (916) 324-5872

REMARKS: Urgent For Your Review Reply ASAP Please Comment

CONFIDENTIAL: This fax contains confidential information and is only intended for the use of the individual to which it is addressed.

Enclosed for your review is a copy of DPR's latest submission of an amended label under the USEPA/DPR Label Revision Project, Tomen Agro Inc.'s Capten Technical, EPA Reg. No. 66330-31. We placed a hard copy of this submission in the mail November 9, 2001.

Thanks Ann

81-1 4 oral
81-2 3 derm
81-3 2 inhe
81-4 1 eye
81-5 4 derm irr
81-6 N/A - Sens

NOV-14-2001 10:27 CA DEPT PEST REG. 1 916 324 5872 P.01/16

A. T McChaud

Department of Pesticide Regulation

Paul E. Helliker
Director

Gray Davis
Governor

Winston H. Hickox
Secretary, California Environmental Protection Agency

November 9, 2001

Ms. Linda Arrington, Ombudsman
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Dear Ms. Arrington:

Submission of a Label Under the U.S. EPA/DPR Label Revision Project

Enclosed for your review and approval is an amended label for Tomen Agro Inc.'s Captan Technical, EPA Reg. No. 66330-31.

Enclosed for your review are:

- Four copies of the proposed amended label (one copy with revisions highlighted); 1 Copy attached
- Latest Confidential Statement of Formula;
- A copy of the currently approved federal product label (accepted 4-20-98); and
- The Department of Pesticide Regulation's (DPR's) review of acute toxicity data (5-4-99).

Data on file with DPR indicate that this product presents a Toxicity Category I eye irritation hazard. The current label bears the signal word "Danger" and the precautionary statement "Causes irreversible eye damage." However, the precautionary statement does not include the word "Corrosive."

Tomen Agro Inc. voluntarily agreed to amend their product label to add the word "Corrosive." The proposed label also contains some other minor changes, all of which have been highlighted.

FLEX YOUR POWER! The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web site at <www.cdpr.ca.gov>.

NOV-14-2001 10:28 CA DEPT PEST REG. 1 916 324 5872 P.02/16

Please return a stamped approved copy of the revised label at your earliest convenience to:

Attn: Ann Prichard
Pesticide Registration Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015
Fax: (916) 324-5872

If you have any questions, please call me at (916) 324-3931 or contact me by e-mail at *aprichard@cdpr.ca.gov.*

Sincerely,

Ann M. Prichard
Senior Environmental Research Scientist
Pesticide Registration Branch

Enclosures

cc: Ms. Kathy Wynn (w/enclosures)

NOV-14-2001 10:28 CA DEPT PEST REG. 1 916 324 5872 P.03/16

Proposed label

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
*CAPTAN	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE

HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

Dear Mr. Byrnes:

Subject: EPA Registration Number
Merpan Captan Technical
Label review request by California DPR

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is not acceptable . The following changes are required for this product:

Revise the Precauationary Statements to include the following language:

"Corrosive. Causes irreversible eye damage.. Do not get in eyes or on clothing. Wear goggles or face shield. May be fatal if inhaled. Avoid braeathing dust Prolonged or frequently repeated skin contact may cause allergic reactions in some Wash thoroughly with soap and water after handling. Removed contaminated clothing and wash clothing before reuse."

The First Aid Statements must be revised to include the following statement:

"NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage."

Place the following statement in close proximity to the First Aid Statements.

This review does not preclude your compliance with the label amendment requirements in the Captan Reregistration Eligibility Document.

Sincerely,

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

cc: Ann Pritchard
Pesticide Registration Branch
Department of Pesticide Regulation

Linda Arrington, Ombudsman
Registration Division
Environmental Protection Agency, 7505C

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have product container or label with you when calling a poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL 1-800-228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with

skin and clothing. Remove contaminated clothing and separately wash clothing before reuse. May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

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Only for formulation into a fungicide for the following use(s):

Seed Treatments:

Alfalfa	Cucumbers	Pumpkins
Barley	Eggplant	Radish
Beans (snap, cowpeas, lentils, soybeans)	Flax	Rape
Beets (table and sugar)	Grasses	Rutabaga
Bluegrass	Kale	Rye
Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
Collards	Peanuts	Swiss Chard
Corn (field, and sweet)	Peas	Tomato
Cotton	Peppers	Trefoil

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Potato (Seed Piece)
Turnip
Wheat

Foliar Treatment:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Plums (Fresh Prunes)
Caneberries (raspberries, blackberries, dewberries)
Strawberries

Post-harvest Dip:

Apple
Cherries
Pears

Pre-plant Root Dip:

Peaches

NON-FOOD/ORNAMENTALS:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers
Dichondra
Gladiolus
Turf (sod, farm and golf course)
Flowering Plants
Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints
Coatings
Plastics
Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

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STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED, OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

Proposed label

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	By Wt
*CAPTAN	91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	6.5%
TOTAL	100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE

HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have product container or label with you when calling a poison control center or doctor or going for treatment.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE,
CALL 1-800-228-5635 ext. 174

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with

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skin and clothing. Remove contaminated clothing and separately wash clothing before reuse. May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products contact – Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

Seed Treatments:

Alfalfa	Cucumbers	Pumpkins
Barley	Eggplant	Radish
Beans (snap, cowpeas, lentils, soybeans)	Flax	Rape
Beets (table and sugar)	Grasses	Rutabaga
Bluegrass	Kale	Rye
Broccoli	Lespedeza	Safflower
Brussels Sprouts	Lettuce	Sesame
Cabbage	Melons (cantaloupe, honeydew, watermelon, and muskmelons)	Shallots
	Milo	
Carrots	Mustard Greens	Sorghum (milo and hulled)
Cauliflower	Oats	Spinach
	Okra	Squash
Clover	Onions	Sunflowers
Collards	Peanuts	Swiss Chard
Corn (field, and sweet)	Peas	Tomato
Cotton	Peppers	Trefoil

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Potato (Seed Piece)
Turnip
Wheat

Foliar Treatment:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Plums (Fresh Prunes)
Caneberries (raspberries, blackberries, dewberries)
Strawberries

Post-harvest Dip:

Apple
Cherries
Pears

Pre-plant Root Dip:

Peaches

NON-FOOD/ORNAMENTALS:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers
Dichondra
Gladiolus
Turf (sod, farm and golf course)
Flowering Plants
Roses

Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints
Coatings
Plastics
Adhesives

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

NOV-14-2001 10:29 CA DEPT PEST REG. 1 916 324 3672 P.07/16

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

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USEPA Approved Label

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENT:
*CAPTAN..... 88.0%
Related Derivatives.....2%
INERT INGREDIENTS:.....10.0%
Total.....100.0%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No.: 66330-31 Net Contents: 25 kg (55.1 lb)

EPA Est. No.: 66330-OH-1

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105

RECEIVED
MAY 09 2000
BY PEST/REGISTRATION
ID#_____

ACCEPTED
with COMMENTS
In EPA Letter Dated
APR 20 1998
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 66330-31

STATEMENT OF PRACTICAL TREATMENT

FIRST AID: -
IF IN EYES: - Hold eyelids open and flush with a steady. gentle stream of water for 15 minutes. Get medical attention.
IF SWALLOWED: - Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, no not give anything by mouth and do not induce vomiting.
IF ON SKIN: - Wash with plenty of soap and water. Get medical attention
IF INHALED: -Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with skin and clothing. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480. Only for formulation into a fungicide for the following uses:

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1. FOOD USE SITES

Seed Treatments:

Alfalfa
Beans
Beets
Broccoli
Brussels Sprouts
Cabbage
Cantaloupe
Carrots
Cauliflower
Cereal Grains
--Barley, Rye
--Oats
--Wheat
Clover
Collards
Corn (field, pop, sweet)
Cotton
Cowpea
Cucumbers
Eggplant
Flax
Grasses
Honeydew
Kale
Lentils
Lespedeza
Lettuce
Melons
Milo
Muskmelons
Mustard Greens
Okra
Onions
Peanuts
Peas
Peppers
Potato (Seed Piece)
Pumpkins
Radish
Rape
Rutabaga
Safflower
Sesame
Shallots
Sorghum
Soybeans
Spinach
Squash
Sugar Beets
Sunflowers
Swiss Chard
Tomato
Taro (Corm)
Trefoil
Turnip
Watermelon

Fruit & Nut Crops:

Almonds
Apples
Apricots
Blueberries
Cherries
Grapes
Nectarines
Peaches
Pears (post harvest only)
Plums (Fresh Prunes)
-
Raspberries
Strawberries

NON-FOOD USE SITES:

Ornamental Plants:

Azaleas
Begonias
Camellias
Carnations
Chrysanthemums
Conifers (ornamental only)
Dichondra
Gladiolus
Grasses (in lawns and turfs, non-pasturing areas)
Ornamental Flowering Plants
Roses
Soil (lawn seedbeds and Greenhouse Bench)

Indoor, Industrial Uses:

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Paints Plastics Adhesives

3. **Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and**

4. **Uses for experimental purposes that are in compliance with USEPA requirements.**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or. f allowed by State and local authorities. by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE: 1. Tomen Agro. Inc. warrants that this product conforms to the chemical description on the label
and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED,**

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INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

NOV-14-2001 10:31 CA DEPT PEST REG. 1 916 324 5872 P.15/16

State of California

Memorandum

To : Peter Leung, Supervisor
Product Review Group
Medical Toxicology Branch

Date : 5/4/99

Place : Sacramento

From : **Department of Pesticide Regulation** - Thomas Moore, Staff Toxicologist
Medical Toxicology Branch

Subject : Request for re-evaluation of the eye irritation hazard presented by Captan Technical

A precautionary labeling discrepancy for the Category I eye irritation hazard presented by exposure to captan technical has been noted. One product is presently registered with DPR for captan technical (Tomen Agro, Inc., EPA Reg. No. 66330-31). Recently, Makhteshim-Agan of North America, Inc. submitted Merpan (Captan) Technical (EPA Reg. No. 11678-1) for registration. The Medical Toxicology Branch reviewed the data cited to support the product's registration (see Product Registration Recommendation Sheet of 1/14/99). The reviewer did not recommend the product's registration because the corrosiveness indicated by the eye irritation data were not adequately identified on the product label. A further review of the eye irritation data on captan technical on file with DPR has confirmed this conclusion.

Three eye irritation studies on the technical were reviewed. In the first study (vol. 103-012, rec. no. 925038), conjunctival redness (grade 2) was noted in the eye of one animal 14 days after treatment (last day of observation) with no indication of corrosiveness. In the second study (provided by the registrant in vol. 103-313, rec. no. 168283), corneal opacity and/or neovascular pannus was noted for 5 of the 6 animals at 21 days after dosing. Similar results were noted for the animals in the third study (vol. 103-300, rec. no. 151733) in which 3 of the 6 animals exhibited corneal opacity at 28 days after dosing.

The registered product from Tomen Agro, Inc., likewise does not adequately identify the corrosiveness indicated by these eye irritation data. Both the product label submitted by Makhteshim-Agan for review and the registered label for the Tomen Agro product have identical precautionary statements. I am requesting that the Tomen Agro product be placed in re-evaluation for adequate labeling of the eye irritation hazard.

D00103>Captanreev

Karen Jones
02/05/2001 03:07 PM

To: Paul Horng/DC/USEPA/US@EPA
cc:
Subject: RE: Status of oustanding data for EPA Reg. Nos. 66330-32 and 6633 0-34

Paul,

Do you have any advice or suggestions for Ms. Lee? See her note below. Otherwise, I will refer her to the Product Manager in RD.

Thanks,
Karen

---------- Forwarded by Karen Jones/DC/USEPA/US on 02/05/2001 03:04 PM ----------

"Lee, Shih-Lo" <slee@tomenagro.com> on 02/05/2001 02:47:23 PM

To: Karen Jones/DC/USEPA/US@EPA
cc: "Stephen Cornes (E-mail)" <scornes@agro.sfr.tomen.com>
Subject: RE: Status of oustanding data for EPA Reg. Nos. 66330-32 and 6633 0-34

Dear Karen:

Captan 66330-31, 66330-32, and 66330-34 used to be identical products with different registration numbers registered by Zeneca (now Syngenta). The main manufacturing process is the same for all three products, only the final pH values were different [redacted]

For 66330-31 (91.5% Captan), we adjust the pH with [redacted]

For 66330-32 (93.4% Captan), we do not add any [redacted]
For 66330-34, (93.0% Captan) we adjust the pH with [redacted]

Therefore the active ingredient concentration is varied for each one of these product slightly. We are currently evaluate whether we should use one basic CSF and 2 alternate CSFs or separate into 3 CSFs. The reason we would like to have 3 registration numbers is that we can easily identify the products by registration numbers. It would be easier to use the same CSF to cover all three products. However, the nominal concentrations of ai contents are different, and we would like to identify ai content on the label.

Do you have any adivse or suggestion for a better way to register Captan Manufacturing Use products? We will try to come back to you with our answers by the end of this week.

Thank you.

Shih-Lo
-----Original Message-----
From: Jones.Karen@epamail.epa.gov [mailto:Jones.Karen@epamail.epa.gov]
Sent: Monday, January 29, 2001 6:33 AM
To: slee@agro.sfr.tomen.com
Subject: Status of oustanding data for EPA Reg. Nos. 66330-32 and 66330-34

Karen:
Tomen's three products 66330-31, -32, and -34 have different nominal concentrations. Tomen should use three separate basic CSFs and three separate labels to identify each product. Paul

Inert ingredient information may be entitled to confidential treatment

Dear Shih-Lo:

I'm checking on the status of the outstanding product chemistry data for the following products:

EPA Reg. No. 66330-32 - 9/21/00 Agency review required data on 61-2b Description of Manufacturing process, 62-1 Preliminary analysis, 63-9 vapor pressure and revised CSFs.

EPA Reg. No. 66330-34 - 11/3/00 Agency review required data on 62-1 Preliminary analysis, 63-9 vapor pressure and revised CSF.

When you get a chance, please let me know the status of the data for these products.

Thanks,
Karen Jones
USEPA/OPP/SRRD/PRB
(703) 308-8047

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

JAN 22 2001

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Shih-Lo Lee
Captan Product Manager
Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan Reregistration Eligibility Document
Review of Acute Toxicity Data

Product Registrations: EPA Reg. Nos. 66330-21, 66330-25, 66330-26, 66330-27, 66330-28, 66330-29, 66330-30, 66330-31, 66330-32, and 66330-34

Dear Ms. Lee:

The Agency has reviewed the acute toxicity data cited and submitted in response to the Captan RED. The Agency's conclusions are as follows:

EPA Reg. Nos. 66330-21, 66330-26, and 66330-27: The acute toxicity data cited from EPA Reg. No. 42056-3 are acceptable to support the reregistration of these products. All acute toxicity data requirements are satisfied.

EPA Reg. Nos. 66330-25, 66330-28, 66330-29, and 66330-30: The submitted acute toxicity data are acceptable and satisfy the data requirements for Guidelines 81-1, 81-2, 81-3, and 81-5. The data submitted for Guidelines 81-4 Primary Eye Irritation and 81-6 Skin Sensitization are unacceptable. However, based on the high irritation and positive skin sensitization potential of captan, these products will be classified as Category I for eye irritation and as positive skin sensitizers. New studies are not required.

EPA Reg. Nos. 66330-31, 66330-32, and 66330-34: The submitted data are acceptable and satisfy the data requirements for Guidelines 81-1, 81-2, 81-3, and 81-5. Guidelines 81-4 and 81-6 are waived.

Copies of the Agency's reviews are enclosed for your records. If you have any questions, please contact me at (703) 308-8047.

Sincerely,

Karen Jones

Karen Jones, Case Review Manager
Product Reregistration Branch
Special Review and
Reregistration Division

Enclosure

TomenAgro

100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

Facsimile Transmission

TO:

Company: EPA

Attention: Karen Jones

Fax#: 703-308-7070

Number of pages: (including cover) 3

FROM:

Name: Shih-Lo Lee

cc: D. Byrne
Files: Cop/USA/R/RED

Date: 1-10-01

Subject: Captan - Acute Dermal Irritation Study
EPA Reg. Nos. 66330-31, 66330-32 & 66330-34.

See attached.

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9893

January 10, 2001

Via Fax

Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047
Fax: 703-308-7070

RE: Captan Data Call-In Product Specific "Acute Dermal Irritation Study"
EPA Registration Nos.: 66330-31, 66330-32 and 66330-34.

Dear Ms. Jones:

Tomen Agro, Inc. would like to cite a previously submitted study "Acute Dermal Toxicity and Skin Irritation of Captan 90 Dust Base" MRID No. 40021401 to fulfill the data requirement of 870.2500 for the Captan technicals (EPA Reg. Nos. 66330-31, 66330-32 and 66330-34).

Please refer to the attached cover page of this study.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

H:\SLL Documents\Captan\Regist\EPA\EPA1\RED\DCI\Acute Tox\Fax letter 01-10-01 to EPA DCI Acute dermal irritation for cap tech.doc

005168

MRID 40021401

C3.1/13

721

CHEVRON CHEMICAL COMPANY
MAKHTESHIM-AGAN
STAUFFER CHEMICAL COMPANY

SUBMITTED TO SUPPORT THE REGISTRATION OF:

CHEVRON Captan Technical
EPA Reg. No. 239-1246

Merpan Captan Technical
EPA Reg. No. 11678-1

Stauffer Captan Technical
EPA Reg. No. 476-2099

PURPOSE OF SUBMISSION:

Captan Registration
056131

TITLE:

Acute Dermal Toxicity and Skin Irritation of
Captan 90 Dust Base

DATA REQUIREMENT:

Guideline Nos. 81-2 and 81-5

AUTHOR:

R. L. Morgan

STUDY COMPLETED ON:

November 26, 1986

PERFORMING LABORATORY

Stauffer Chemical Company
Richmond Toxicology Laboratory
Richmond, California 94804

FILE COPY

LABORATORY PROJECT IDENTIFICATION

T-12526

MRID # 40021401

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 10, 2001

MEMORANDUM:

Subject: EPA Reg. No.: **66330-31/** Captan Technical
DP Barcode: D271562

EPA Reg. No.: **66330-32/** Captan Technical-F
DP Barcode: D271563

EPA Reg. No.: **66330-34/** Captan 90 Dust Base
DP Barcode: D271566
Case No.: 0120

From: Ann Hanger, Environmental Protection Specialist A. Hanger
Product Reregistration Branch
Special Review and Reregistration Division (7508C) MJP

To: Karen Jones, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

FORMULATION FROM EPA Reg. No. 66330-31 LABEL:

	% by wt.
Active Ingredient(s):	
Captan	91.5%
Related Derivatives	2.0%
Other Ingredient(s):	6.5%
Total	100.0%

FORMULATION FROM EPA Reg. No. 66330-32 LABEL:

	% by wt.
Active Ingredient(s):	
Captan	93.4%
Related Derivatives	2.0%
Other Ingredient(s):	4.6%
Total	100.0%

FORMULATION FROM **EPA Reg. No. 66330-34** LABEL:

	% by wt.
Active Ingredient(s):	
Captan	93.0%
Related Derivatives	2.0%
Other Ingredient(s):	5.0%
Total	100.0%

BACKGROUND: In the 8 month response to the Captan RED, the registrant submitted acute toxicity studies performed on technical captan to support the acute toxicity requirements for their technical products, EPA Reg. Nos. 66330-31, 66330-32, and 66330-34, all listed in batch 1 according to the Captan RED. The submitted MRID's are as follows: 452882-01, 452882-02, 452882-03, and 400214-01. A waiver was requested for the primary eye irritation and skin sensitization guidelines. In accordance with the Captan RED, the registrant is accepting a category I classification for the primary eye irritation guideline and a positive skin sensitization classification for the subject products. The submitted studies were conducted on EPA Reg. No. 66330-31 by Springborn Laboratories and Huntingdon Life Sciences with the exception of MRID 400214-01 which was conducted on EPA Reg. No. 66330-34 by Stauffer Chemical Company.

RECOMMENDATIONS:

- The waiver requests for primary eye irritation and skin sensitization are acceptable. As per the Captan RED, the subject products will be assigned a category I for primary eye irritation and will be classified as positive skin sensitizers.

- The acute oral, acute dermal, acute inhalation, and primary dermal irritation studies are acceptable.

The acute toxicity requirements for EPA Reg. Nos. 66330-31, -32, and -34 are satisfied.

The acute toxicity profile for EPA Reg. Nos. **66330-31, 66330-32, and 66330-34** is currently:

Acute Oral	IV	Acceptable
Acute Dermal	IV	Acceptable
Acute Inhalation	II	Acceptable
Primary Eye	I	Waived
Primary Dermal	IV	Acceptable
Skin Sensitization	Sensitizer	Waived

PRECAUTIONARY LABELING

ID #: 066330-00031 CAPTAN TECHNICAL
ID #: 066330-00032 CAPTAN TECHNICAL-F
ID #: 066330-00034 CAPTAN 90 DUST BASE

SIGNAL WORD: DANGER PELIGRO

HAZARDS TO HUMANS AND DOMESTIC ANIMALS*:

Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Do not get in eyes or on clothing. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-XXX-XXXX for emergency medical treatment information.

The following "Note to Physician" statement is required for the subject product:

NOTE TO PHYSICIAN; Probable mucosal damage may contraindicate the use of gastric lavage.

Note to PM/CRM/Registrant: The proposed label should contain a "Note to Physician" which addresses the eye irritation toxicity. The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological

effects of the pesticide;

- company telephone number to specific medical personnel who can provide specialized medical advice.

USER SAFETY RECOMMENDATIONS:

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove contaminated clothing and wash clothing before reuse.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.

DATA REVIEW FOR ACUTE ORAL TOXICITY TESTING (§81-1, 870.1100)

Product Manager: Cynthia Giles-Parker, 22
MRID No.: 452882-01

Reviewer: Ann Hanger
Study Completion Date: 11-DEC-2000
Study No.: 3527.8

Testing Facility: Springborn Laboratories
Author: K. Bonnette
Quality Assurance (40 CFR §160.12): Included

Test Material: EPA Reg. No. 66330-31
Species: Rat; Sprague-Dawley SD
Age: Young adult
Weight **(prefasted):** Males: 238-267 g; Females: 206-219 g

Source: Harlan Sprague Dawley, Inc.
Conclusion:

1. **LD_{50} (mg/kg):**
   Males: >5,000 mg/kg
   Females: >5,000 mg/kg
   Combined: >5,000 mg/kg
2. **The estimated LD_{50} is** >5,000 mg/kg
3. **Tox. Category:** IV **Classification:** Acceptable

Procedure (Deviations from §81-1): None

Results:

Dosage (mg/kg)	Number of Deaths/Number Tested		
	Males	Females	Combined
5,000	0/5	0/5	0/10

Observations: No mortality occurred during the limit test. The most notable clinical abnormalities observed during the study included soft and/or mucoid stools, decreased defecation, dark material around the facial area, breathing abnormalities, slight fecal/urine staining, unkempt appearance, rough coat and clear ocular discharge.

Gross Necropsy: No test related gross internal findings were observed at necropsy on study day 14.

DATA REVIEW FOR ACUTE DERMAL TOXICITY TESTING (§81-2, 870.1200)

Product Manager: Cynthia Giles-Parker, 10
MRID No.: 452882-02

Reviewer: Ann Hanger
Study Completion Date: 11-DEC-2000
Study No.: 3527.9

Testing Facility: Springborn Laboratories, Inc.
Author: K. Bonnette
Quality Assurance (40 CFR §160.12): Included

Test Material: EPA Reg. No. 66330-31
Species: Rabbit; New Zealand White
Age: 13-15 weeks
Weight: Males: 2.9-3.3 kg; Females: 2.8-3.0 kg
Source: Myrtle's Rabbitry, Thompson Station, TN
Dermal LD_{50} Testing:

Conclusion:

1. **LD_{50} (mg/kg):**
   Males: > 5,000 mg/kg
   Females: > 5,000 mg/kg
   Combined: > 5,000 mg/kg
2. **The estimated LD_{50} is** > 5,000 mg/kg
3. **Tox. Category:** IV **Classification:** Acceptable

Procedure (Deviations from §81-2): None

Results:

Dosage (mg/kg)	Number of Deaths/Number Tested		
	Males	Females	Combined
5,000	0/5	0/5	0/10

Observations: Clinical abnormalities observed during the study included decreased defecation and soft stools. Dermal irritation was noted at the site of test article application. A slight body weight loss was noted in one female during the day 0-7 body weight interval. Body weight gain was noted for all other animals during the test period.

Gross Necropsy: No significant gross internal findings were observed at necropsy on study day 14.

DATA REVIEW FOR ACUTE INHALATION TOXICITY TESTING (§81-3, 870.1300)

Product Manager: Cynthia Giles-Parker, 22
MRID No.: 452882-03

Reviewer: Ann Hanger
Study Completion Date: 16-NOV-2000
Study No.: 00-5439

Testing Facility: Huntingdon Life Sciences
Author: G. Hoffman
Quality Assurance (40 CFR §160.12): Included

Test Material: EPA Reg. No. 66330-31
Species: Rat; Sprague-Dawley CD
Age: Young adult
Weight: Males: 307-370 g; Females: 225-258 g
Source: Charles River Laboratories, Kingston, NY

Conclusion:

1. **LC_{50} (mg/L):**
   Males: > 0.0720 mg/L
   Females: > 0.0720 mg/L
   Combined: > 0.0720 mg/L
2. **The estimated LC_{50} is** > 0.0720 mg/L
3. **Tox. Category:** II **Classification**: Acceptable

Procedure **(Deviations from §81-3):** None

Exposure Concentration mg/L (Gravimetrically Determined)	Number of Deaths/Number Tested		
	Males	Females	Combined
0.0720	1/5	0/5	1/10
0.648	4/5	4/5	8/10
2.28	5/5	5/5	10/10

Clinical Observations: The signs of toxicity noted during the exposure periods were labored breathing during the 2.28 and 0.648 mg/L groups and poor condition during the 2.28 mg/L group. There were no signs of toxicity noted during the 0.0720 mg/L group.

Upon removal from the chamber, signs of toxicity in surviving animals included clear or red nasal discharge, chromodacryorrhea, excessive salivation, labored breathing and moist rales. Wet fur and tan or white material on fur were also frequently noted but were considered a result of the nose-only exposure regimen.

Gross Necropsy Findings: Macroscopic test substance related findings were red mucinous material in the nasal cavity and fluid in the trachea and lung. These were present in rats found dead. Thin red fluid in the thoracic cavity of several rats at 2.28 mg/L was considered to be secondary to the pulmonary findings. Animals found dead had red lungs. The relationship, if any, of this finding to the test substance is not clear because red lungs are a common finding in animals which are not exsanguinated prior to postmortem examination. Scattered red foci in the lungs of rats terminally sacrificed are usually due to agonal hemorrhages. Other macroscopic findings in the lungs and in other tissues and organs occurred sporadically and were not

considered to be test substance related.

Chamber Atmosphere		
Grav. Conc.	MMAD (µm)	GSD (µm)
0.0720 mg/L	2.545 (average)	2.585 (average)
0.648 mg/L	2.611 (average)	2.369 (average)
2.28 mg/L	2.979 (average)	2.391 (average)

Other Information: Approximately 63-69% of particles were less than 4.0 µm.

Chamber Environment	
Chamber Volume	40 L
Airflow	25.0-27.4 LPM
Temperature	16-27°F
Relative Humidity	56-87%

Nose only

DATA REVIEW FOR PRIMARY EYE IRRITATION TESTING (§81-4, 870.2400)

Product Manager: Cynthia Giles-Parker
MRID No.: 452881-03

Reviewer: Ann Hanger
Study Completion Date: 14-SEP-1993
Study No.: CTL/P/4171

Testing Facility: Zeneca Central Toxicology Laboratory
Author: L. Duerden; A.M. Leah
Quality Assurance (40 CFR §160.12): Included

Test Material: EPA Reg. No. 66330-28
Dosage: 0.5 g
Species: Rabbits; New Zealand White; albino
Age: Young adult
Weight: 3447-3572 g
Source: Conventional Animal Breeding Unit, Zeneca Pharmaceuticals, Alderley Park, Macclesfield, Cheshire, UK
Conclusion:

1. **Toxicity Category:** I
2. **Classification:** Unacceptable

Procedure (Deviations from §81-4): The test was not carried out until irritation subsided using at least 3 animals. Based on the eye irritation potential of captan and the resulting pain using the test material, a category I will be assigned to the test material.

Observations	Number "positive"/number tested						
	Hours				Days		
	1	24	48	72	4	7	9
Corneal Opacity	?	2/2	3/3	1/1	1/1	0/1	0/1
Iritis	?	2/2	3/3	1/1	1/1	1/1	0/1
Conjunctivae:							
Redness	3/3	3/3	3/3	1/1	1/1	1/1	0/1
Chemosis	3/3	3/3	3/3	0/1	0/1	0/1	0/1
Discharge	3/3	2/3	2/3	0/1	0/1	0/1	0/1

Summary: Instillation into the eye caused moderate initial pain in the first animal dosed. The eyes of the remaining two animals were pre-treated with a local anesthetic and initial pain could not be assessed. Conjunctival effects, seen in all animals from approximately 1.5 hours after application, consisted of moderate to severe redness, slight to moderate chemosis and a slight to severe discharge. The degree of chemosis prevented the assessment of corneal and iridial effects for up to 2 days after application. Slight iritis was seen in all three animals during the study. Corneal effects, in all three animals, consisted of slight or mild opacity affecting up to the whole area of the cornea. Additional signs of irritation included edema and erythema of the eyelids, hemorrhage and suspected necrosis of the nictitating membrane, and closure of the eye (generally considered to be indicative of pain.) Two animals were humanely killed 2 days after application and therefore, a full assessment of ocular irritation could not be completed. However, the formulation has the potential to cause at lease moderate to severe ocular irritation.

DATA REVIEW FOR PRIMARY DERMAL IRRITATION TESTING (§81-5, 870.2500)

Product Manager: Cynthia Giles-Parker, 22
MRID No.: 400214-01

Reviewer: Ann Hanger
Study Completion Date: 26-NOV-1986
Study No.: T-12526

Testing Facility: Stauffer Chemical Company
Author: R. L. Morgan
Quality **Assurance (40 CFR §160.12):** Included

Test **Material:** EPA Reg. No. 66330-34
Dosage: 0.5 g
Species: Rabbits; Albino
Age: Young adult
Weight: 1.403-1.830 kg
Source: Nitabell Rabbitry, Hayward, CA
Conclusion:

1. **Toxicity Category:** IV
2. **Classification**: Acceptable

Procedure (Deviations from §81-5): None

Results: No positive effects were observed.

Special Comments: None

DATA REVIEW FOR DERMAL SENSITIZATION TESTING (§81-6, 870.2600)

Product Manager: Cynthia Giles-Parker, 22
MRID No.: 452881-05

Reviewer: Ann Hanger
Study Completion Date: 19-JUL-1993
Report No.: CTL/P/4048

Testing Facility: Zeneca Central Toxicology Laboratory
Author: L. Duerden, A.M. Leah

Quality Assurance (40 CFR §160.12): Included

Test Material: EPA Reg. No. 66330-28
Positive Control Material: 1-Chloro-2,4-Dinitrochlorobenzene (DNCB), 0.1% in 10% aqueous ethanol
Species: Guinea pig; Hartley Albino
Age: Young adult
Weight: Female: 385-555 g; Males: 325-404 g
Source: Harlan Porcellus, Firgrove Farm, Cross-in-Hand, Heatherfield, Sussex, UK
Method: Buehler
Conclusion:

1. **This product is considered to be a dermal sensitizer.**
2. **Classification**: Unacceptable

Procedure (Deviations from §81-6): The same concentration of test material (75%) was used for induction and challenge. Since no irritation was observed using the 75% concentration, a higher percentage should have been used for induction to elicit a minimally irritating concentration.

Procedure: The test substance at 75% (0.4 mL) was applied once a week for three weeks, for a total of three exposures. Two weeks later, the challenge dose of the test material was administered at 75%.

Results: Following challenge, no erythema was observed.

ACUTE TOX ONE-LINERS

1. **REGISTRATION NO.:** 66330-31, -32, and -34
2. **PC CODE:** 081301 Captan & related derivatives 93.5-94.6%
3. **CURRENT DATE:** January 10, 2001
4. TEST MATERIAL: EPA Reg. No. 66330-31

Study/Species/Lab Study #/Date	MRID	Results	Tox. Cat.	Core Grade
Acute oral toxicity rat/ Springborn Laboratories, Inc./ 3527.8/ 11-DEC-2000	452882-01	Combined LD_{50} > 5,000 mg/kg	IV	A
Acute dermal toxicity rabbit/ Springborn Laboratories/ 3527.9/ 11-DEC-2000	452882-02	Combined LD_{50} > 5,000 mg/kg	IV	A
Acute inhalation toxicity/rat/ Huntingdon Life Sciences/ 00-5439/ 16-NOV-2000	452882-03	Combined LC_{50} > 0.0720 mg/L	II	A
Primary dermal irritation rabbit/ Stauffer Chemical Company/ T-12526/ 26-NOV-1986	400214-01	No irritation was observed at 72 hours.	IV	A

Core Grade Key: **A =Acceptable, S = Supplementary, U = Unacceptable, V = Self Validated**

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

JAN 5 2001

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Shih-Lo Lee
Captan Product Manager
Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan Reregistration Eligibility Document
Review of Product Chemistry Data

Product Registration: Captan Technical (EPA Reg. No. 66330-31)

Dear Ms. Lee:

The Agency has reviewed the supplemental product chemistry data (MRID 45285812) on vapor pressure submitted to support the reregistration of the Captan Technical. The Agency has concluded that these data are acceptable and fulfill the data requirements for Guideline 830-7950 Vapor Pressure. All of the product chemistry data requirements are now fulfilled for this product. A copy of the Agency's review is enclosed for your records. If you have any questions, please contact me at (703) 308-8047.

Sincerely,

Karen Jones

Karen Jones, Case Review Manager
Product Reregistration Branch
Special Review and
Reregistration Division

Enclosure

DATE OUT: 2/JAN/2001

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF: Technical Product [x], End-Use Product []**
BARCODE No. : D271525; D269316; D268546 ; **CASE No.:** 003582 ;**EPA RECEIVED DATE:** 18/AUG/00;
REG./File Symbol No.: 66330-31; **PRODUCT NAME**: Captan Technical; **COMPANY NAME**: Tomen Agro, Inc. ;Action Code: 674 8-Month Response to Product Specific Data Call-In

FROM: Paul Horng, Ph. D., Chemist Paul Horng
Product Chemistry Team
Product Reregistration Branch (7508C)
Special Review and Reregistration Division
Office of Pesticide Program
USEPA

TO: Karen Jones, CRM
Product Reregistration Branch (7508C)
Special Review and Reregistration Division
Office of Pesticide Program
USEPA

INTRODUCTION:

The registrant, Tomen Agro, Inc., responded to our previous memorandum (Paul Horng; D269316; 17/OCT/00) by submitting the supplemental product chemistry data in MRIDs # 452858-12; to fulfill the product chemistry data requirements for reregistration of Captan Technical, Reg. No. 66330-31.

FINDINGS:

1. The submitted data in MRID # 452858-12 satisfy the product chemistry data requirement for the Guideline 63-9 (830-7950, Vapor Pressure). No additional data are required.

As mentioned in previous review, some revisions are required for the draft label. (1) The statement "Do not contaminate with water, food, or feed by storage and disposal." is currently inside the storage statement, must be moved out and placed directly under the Storage and Disposal heading. (2) The statement of Pesticide Storage should be revised to read " Pesticide Storage: Store the product in a cool and dry place." (3) Pesticide Disposal statement should be revised by deleting the sentence "Pesticide wastes are acutely hazardous." from the statement. The revisions of the draft label can be done after label review.

RECOMMENDATIONS:

The registrant has satisfied all product chemistry data requirements for reregistration of this subject product. The Agency will have no objection to the reregistration of Captan Technical, EPA Reg. No. 66330-31.

Paul Horng: Central File (Reg. No. 66330-31).
7508C: P.H.; PRB; SRRD; 2/JAN/2001; 703-308-8053; <66330-31 >

Group B: Series 830- **Physical and Chemical Properties (40 CFR 158.190)**
MRID # 451923-12.

GUIDELINE NO.(GRN)	DESCRIPTION/ METHODS USED WHERE APPLICABLE AND REFERENCES	Comments
-6302 Color.	Cream color.	A
-6303 Physical State.	Solid at 20°C.	A
-6304 Odor.	Pungent & nutty odor.	A
-6305 Melting point	171-174°C.	A
-7300 Density	0.55 g/ml (or g/cm^3)	A
-7840/60 Solubility	The solubility of captan to the following solvents (in g/100ml) are: water, < 0.5 ppm (25°C); acetone, 2.1; ethanol , <0.5; chloroform, 7.0; ; isopropanol, 0.17; xylene, 2.0; cyclohexanone, 2.3. MRID # 402312-01.	A
-7950 Vapor Pressure.	The vapor pressure was determined at five temperatures between 70 and 110°C. By extrapolation of these data, a vapor pressure at 25°C was calculated to be 8×10^{-5} microns Hg (or 8×10^{-8} torr, or 1×10^{-5} Pascal). MRID # 452858-12.	A
- 7370 Dissociation Constant	N/A, captan is neither an acid nor a base. It is very low water solubility (0.50 ppm at 25°C).	N/A
-7550-7570. Octanol/ Water Partition Coefficient	Kow= 610 at 25°C.	A
-7000 pH	4.85 [1% solution in water/acetone (1:1, v/v)] at 25°C.	A
-6313 Stability	Captan technical is stable at ambient temperature up to 14 months. Thermal stability tested at 54°C for 2 weeks, no change is concentration was observed. UV irradiated at 254 nm for 240 hours, no significant change in concentration of the active ingredient was observed. The hydrolytic stability at 20°C at pH 4.0, 7.0, and 10.0 was 32.4, 8.3, and < 2 minutes, respectively. Carbon steel and stainless steel 304 coupons 50x3x3 mm size were closely contacted with 700 ml of test substance at 30- 40°C and incubated for 480 hours (20 days). The corrosion rate of carbon steel and stainless steel 304 was 0.14 and 0.02 mil per year, respectively.	A

A: acceptable; N/A: not applicable; Gap: data gap.

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number TOMEN AGRO, INC. 100 First Street, Suite 1700 San Francisco, CA 94105 (415)536-3480	EPA Registration Number/File Symbol 66330-31
Active Ingredient(s) and/or representative test compound(s) CAPTAN	Date DEC 18 2000
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)	Product Name Captan Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Shih-Lo Lee	12-18-00	Dr. Shih-Lo Lee, Proj. Mgr./Sr. Chemist, Regis. & R

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

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DATA MATRIX

Date Dec. 18, 2000	EPA Reg No./File Symbol 66330-31	Page of
Applicant's/Registrant's Name & Address TOMEN AGRO, INC. 100 First Street, Suite 1700 San Francisco, CA 94105	Product Captan Technical	

Ingredient CAPTAN

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 870.1100	Acute Oral Toxicity		Tomen Agro, Inc.		
OPPTS 870.1200	Acute Dermal Toxicity		Tomen Agro, Inc.		
OPPTS 870.1300	Acute Inhalation Toxicity		Tomen Agro, Inc.		
OPPTS 830 Series	Product Chemistry		Tomen Agro, Inc.		
OPPTS 830 Series	Supplemental Product Chemistry		Tomen Agro, Inc.		
OPPTS 830.7950	Vapor Pressure		Tomen Agro, Inc.		
OPPTS 830.1700	Preliminary Analysis	45210001	Tomen Agro, Inc.		
OPPTS 830.1800	Enforcement Analytical Method	45216201	Tomen Agro, Inc.		

Signature	Name and Title Dr. Shih-Lo Lee, Project Manager, Regis. & Regul. Affairs	Date 12-18-00

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date Dec. 18, 2000	EPA Reg No./File Symbol 66330-31	Page of
Applicant's/Registrant's Name & Address TOMEN AGRO, INC. 100 First Street, Suite 1700 San Francisco, CA 94105	Product Captan Technical	

Ingredient CAPTAN

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
[redacted]			Tomen Agro, Inc.		
			Tomen Agro, Inc.		
			Tomen Agro, Inc.		
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			Tomen Agro, Inc.		
			Tomen Agro, Inc.		

Signature	Name and Title	Date
	Dr. Shih-Lo Lee, Project Manager, Regis. & Regul. Affairs	12-18-00

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

December 18, 2000

452882-00

Document Processing Desk (RED-SRRD-PRB)
Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047

RE: Captan Data Call-In Product Specific "Acute Toxicology Studies"

EPA Registration Nos.: 66330-14, 66330-15, 66330-19, 66330-21, 66330-24, 66330-25, 66330-26, 66330-27, 66330-28, 66330-29, 66330-30, 66330-31, 66330-32 and 66330-34.

Dear Ms. Jones:

We are submitting acute toxicology studies to fulfill the data requirements as specified in the Captan RED document issued in 1999.

Please refer to the attached Table 1. for the data package submitted. We have enclosed EPA forms, 8570-32 (and copies of agreement), 8570-34 and 8570-35 in volume 1 of this submission.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

TRANSMITTAL DOCUMENT

1. Name and address of submitter

   Tomen Agro, Inc.
   100 First Street, Suite 1700
   San Francisco, CA 94105

2. Regulatory action in support of which this package is submitted.

   EPA Data Call-in for reregistration of Captan.

3. Transmittal date

   December 18, 2000.

4. List of submittal studies. (A total of 21 volumes)

   Vol. 1. Administrative Materials

   (a) EPA Form 8570-32

   (b) Letters of Agreements: Gustafason and Trace Chemical

   (c) EPA Form 8570-34 & 8570-35

   Vol. 2 through Vol. 21 containing acute toxicology studies for Tomen Agro's products.

   Please refer to the tabulated information in the following pages for the studies submitted.

Product Name (EPA Reg. No.)	**Data Requirement Guideline No.**	**Data Submitted**	**Volume Submission No.**
Batch 7 Captan 5 Potato Seed Treatment Fungicide (66330-14) Captan 10 Potato Seed Treatment Fungicide (66330-15)	Acute Oral Toxicity 870.1100	Cite Batch 3 data	—
	Acute Dermal Toxicity 870.1200	Cite Batch 3 data	—
	Acute Inhalation 870.1300	Cite Batch 3 data	—
	Primary Eye Irritation 870.2400	Waiver requested (Category I)	—
	Acute Dermal Irritation 870.2500	Cite Batch 3 data	—
	Skin Sensitization 870.2600	Waiver requested (Skin sensitizer)	—
Batch 10 Isotox Seed Treater F (66330-19)	Acute Oral Toxicity 870.1100	Yes	Volume 2 of 21
	Acute Dermal Toxicity 870.1200	Yes	Volume 3 of 21
	Acute Inhalation Toxicity 870.1300	Yes	Volume 4 of 21
	Primary Eye Irritation 870.2400	Waiver requested (Category I)	—
	Acute Dermal Irritation 870.2500	Yes	Volume 5 of 21
	Skin Sensitization 870.2600	Waiver requested (Skin sensitizer)	—
Batch 4 Captan SP 4 Flowable Seed Protectant (66330-24)	Acute Oral Toxicity 870.1100	Yes	Volume 6 of 21
	Acute Dermal Toxicity 870.1200	Yes	Volume 7 of 21
	Acute Inhalation Toxicity 870.1300	Yes	Volume 8 of 21
	Primary Eye Irritation 870.2400	Waiver requested (Category I)	—
	Acute Dermal Irritation 870.2500	Yes	Volume 9 of 21
	Skin Sensitization 870.2600	Waiver requested (Skin sensitizer)	—

(Continued on the following page)

Product Name (EPA Reg. No.)	Data Requirement Guideline No.	Data Submitted	Volume Submission No.
Batch 3 Captan 50 WP (66330-26) Captan Garden Spray (66330-27) Captan Moly Soybean Seed Treater (2x) (66330-21)	Acute Oral Toxicity 870.1100	Yes	Volume 10 of 21
	Acute Dermal Toxicity 870.1200	Yes	Volume 11 of 21
	Acute Inhalation Toxicity 870.1300	Yes	Volume 12 of 21
	Primary Eye Irritation 870.2400	Waiver requested (Category I)	—
	Acute Dermal Irritation 870.2500	Yes	Volume 13 of 21
	Skin Sensitization 870.2600	Waiver requested (Skin sensitizer)	—
Batch 2 Captan 75 Seed Protectant (66330-25) Captan 80 WP (66330-28) Captan 80 WG (66330-29) Captan 75 WDG (66330-30)	Acute Oral Toxicity 870.1100	Yes	Volume 14 of 21
	Acute Dermal Toxicity 870.1200	Yes	Volume 15 of 21
	Acute Inhalation Toxicity 870.1300	Cite Batch 1 Captan technical	—
	Primary Eye Irritation 870.2400	Yes	Volume 16 of 21
	Acute Dermal Irritation 870.2500	Yes	Volume 17 of 21
	Skin Sensitization 870.2600	Yes	Volume 18 of 21
Batch 1 1. Captan Technical (66330-31) 2. Captan Technical-F (66330-32) 3. Captan 90 DB/ Captan Technical – M (66330-34)	Acute Oral Toxicity 870.1100	Yes	Volume 19 of 21 45288201
	Acute Dermal Toxicity 870.1200	Yes	Volume 20 of 21 45288202
	Acute Inhalation Toxicity 870.1300	Yes	Volume 21 of 21 45288203

WAIVER REQUESTS

(1) Waiver Requests for Primary Eye irritation (870.2400) and Skin Sensitization (870.2600)

According to Captan RED document, a dermal sensitization study is not required because Captan is known to cause dermal sensitization in humans. Captan is also a known potential eye irritant; therefore we are accepting "Category I" classification on the labels for all Captan products. We are requesting waivers for "Primary Eye Irritation" and "Skin Sensitization" studies for all Captan products except for Captan 80WP. Those study reports for Captan 80WP were available before the DCI.

(2) Waiver Requests for Captan 5 Potato Seed Protectant Fungicide (66330-14) and Captan 10 Potato Seed Protectant Fungicide (66330-15)

Captan 5 and 10 Potato Seed Protectant Fungicides are diluted versions (containing 5 to 10% Captan active ingredients and related derivatives) of Captan 50WP, therefore we are requesting to cite data of Captan 50 WP (50% Captan active ingredients) for those two products' label statements.

Company Official: Shih-Lo Lee, Ph.D.
Project Manager

Company Name: Tomen Agro, Inc.

Company Contact: Shih-Lo Lee
Phone: (415)-536-3467
Fax: (415)-284-9884
E-mail: slee@tomenagro.com

66330-31

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX (415) 284-9883

December 14, 2000

452858-00

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Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047

RE: Captan Data Call-In Product Specific "Product Chemistry" Supplemental Information

Dear Ms. Jones:

We are submitting additional product chemistry information to fulfill the data gaps identified by the EPA reviewer for our submission dated August 15, 2000. Enclosed are transmitted data packages for the product chemistry. We will submit data gaps for Captan technical-F (66330-32) and Captan technical-M (66330-34) in February that is within 60 days after we received the agency's comments. The acute toxicology part will be submitted later in December along with the forms of Certification with Respect to Data Compensation Requirements and Data Matrix. Three sets of Captan product chemistry data, and two sets of revised confidential statement of formulas are included.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

TRANSMITTAL DOCUMENT

1. Name and address of submitter

Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

2. Regulatory action in support of which this package is submitted.

EPA Data Call-in for reregistration of Captan.

3. Transmittal date

December 14, 2000.

4. List of submittal studies.

Vol. 1. Revised Confidential Statement of Formulas (Form 8570-4)

Captan SP4 Flowable Seed Protectant (Basic) EPA Reg. No. 66330-24
Captan 80 WP (Basic, Alt. A & Alt.B) EPA Reg. 66330-28
Captan 80 WG/Captan 80WP WSP (Basic, Alt. A & Alt.B) EPA Reg. No. 66330-29
Captan Technical (Basic) EPA Reg. No. 66330-31

45285801 Vol. 2. Supplemental – Captan Potato Seed Protectant 5 (MRID 45192301) Reg # 66330-14
45285802 Vol. 3. Supplemental – Captan Potato Seed Protectant 10 (MRID 45192302) 66330-15
45285803 Vol. 4. Supplemental – Isotox Seed Treater (F) (MRID 45192303) 66330-19
45285804 Vol. 5. Revision – Captan Moly Soybean Seed Protectant 2X (MRID 45192304) – 66330-21
45285805 Vol. 6. Supplemental – Captan SP4 Flowable Seed Protectant (MRID 45192305) – 66330-24
45285806 Vol. 7. Supplemental – Captan 75 Seed Protectant Fungicide (MRID 45192306) 66330-25
45285807 Vol. 8. Supplemental – Captan 50 WP (MRID 45192307) 66330-26
45285808 Vol. 9. Supplemental – Captan Garden Spray (MRID 45192308) 66330-27
45285809 Vol. 10. Supplemental – Captan 80 WP (MRID 45192309) 66330-28
45285810 Vol. 11. Supplemental – Captan 80 WG/Captan 80WP WSP (MRID 45192310) 66330-29
45285811 Vol. 12. Supplemental – Captan 75 WDG (MRID 45192311) 66330-30
45285812 Vol. 13. Vapor Pressure – Captan 66330-31

Company Official: Shih-Lo Lee, Signature
Project Manager

Company Name: Tomen Agro, Inc.

Company Contact: Shih-Lo Lee

Phone: (415)-536-3467
Fax: (415)-284-9884
E-mail: slee@tomenagro.com

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Form **3800**, April 1995

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102595-99-M-0079

PS Form **3800**, April 1995 *(Reverse)*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV - 8 2000

CERTIFIED MAIL

Ms. Shih-Lo Lee
Captan Product Manager
Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan Reregistration Eligibility Document
Review of Product Chemistry Data

Product Registrations: Captan Technical (EPA Reg. No. 66330-31)
Captan Technical (M) (EPA Reg. No. 66330-34)

Dear Ms. Lee:

The Agency has reviewed the product chemistry data (MRIDs 45210001 and 45216201) submitted to support the reregistration of your captan products. The Agency's conclusions are as follows:

EPA Reg. No. 66330-31: The submitted data (MRIDs 45210001 and 45216201) are acceptable and fulfill Guidelines 62-1 Preliminary Analysis and 62-3 Enforcement Analytical Method. **However, product chemistry data remain outstanding for Guideline 63-9 Vapor Pressure.** Furthermore, the Confidential Statement of Formula dated 06/30/00 is acceptable. Please refer to the enclosed Agency review for details.

EPA Reg. No. 66330-34: The preliminary analysis data (MRID 4521001) do not support the data requirement (Guideline 62-1) for EPA Reg. No. 66330-34. **You are required to either submit another preliminary analysis study or change the nominal concentrations of captan and AI related derivatives on the CSF and label from 93.0% and 2.0% to 90.0% and 3.0% respectively. Also, product chemistry data remain outstanding for Guideline 63-9 Vapor Pressure.** Furthermore, the Confidential Statement of Formula dated 06/12/00 **is not acceptable and must be revised.** Please refer to the enclosed Agency review for details.

CONCURRENCES								
SYMBOL	7508C	7508C						
SURNAME	K Jones	Propst						
DATE	11/8/00	11/8/00						

*U.S. Government Printing Office: 1992 — 820-856/40672

Within **60 days** from receipt of this letter, you are required to submit the outstanding product chemistry data and revised CSF. Failure to comply may result in a Notice of Intent to Suspend for your captan product registrations. If you have any questions, please contact Karen Jones at (703) 308-8047.

Sincerely,

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and
Reregistration Division

Enclosures

DATE OUT: 17/OCT/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Technical Product [x], End-Use Product []
BARCODE No. : D269316; D268546 ; **CASE No.:** 003582 ;**EPA RECEIVED DATE:** 18/AUG/00;
REG./File Symbol No.: 66330-31; **PRODUCT NAME:** Captan Technical; **COMPANY NAME:** Tomen Agro, Inc. ;**Action Code:** 674 8-Month Response to Product Specific Data Call-In

FROM: Paul Horng, Ph. D., Chemist
Product Chemistry Team
Product Reregistration Branch (7508C)
Special Review and Reregistration Division
Office of Pesticide Program
USEPA

Paul Horng

TO: Karen Jones, CRM
Product Reregistration Branch (7508C)
Special Review and Reregistration Division
Office of Pesticide Program
USEPA

INTRODUCTION:

The registrant, Tomen Agro, Inc., responded to our previous memorandum (Paul Horng; D268546; 14/SEP/00) by submitting the supplemental product chemistry data in MRIDs # 452100-01 & 452162-01; to fulfill the product chemistry data requirements for reregistration of Captan Technical, Reg. No. 66330-31.

FINDINGS:

1(a). The submitted data in MRID # 452100-01 satisfy the product chemistry data requirement for Guideline 62-1 (830-1700, Preliminary Analysis). The submitted data in MRID # 452162-01 satisfy the data requirement for Guideline 62-3 (830-1800, Enforcement Analytical Method).

1(b). No data were submitted for the Guideline 63-9 (830-7950, Vapor Pressure) and are still outstanding.

2. The submitted CSF, a basic formulation 30/JUN/2000, has been filled out completely and correctly. The CSF is acceptable.

3. As mentioned in previous review, some revisions are required for the draft label. (1) The statement "Do not contaminate with water, food, or feed by storage and disposal." currently inside the storage statement must be moved out and placed directly under the Storage and Disposal heading. (2) The statement of Pesticide Storage should be revised to read " Pesticide Storage: Store the product in a cool and dry place." (3) Pesticide Disposal statement should be revised by deleting the sentence "Pesticide wastes are acutely hazardous." from the statement. The revisions of the draft label can be done after label review.

RECOMMENDATIONS:

Except for the data gap noted in Finding # 1(b), the registrant has satisfied all product chemistry data requirements for reregistration of this subject product. Once the outstanding data have been submitted and satisfies, the Agency will have no objection to the reregistration of Captan Technical, EPA Reg. No. 66330-31.

Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)
MRID # 451923-12.

GUIDELINE NO.(GRN)	DESCRIPTION/ METHODS USED WHERE APPLICABLE AND REFERENCES	Comments
-6302 Color.	Cream color.	A
-6303 Physical State.	Solid at 20°C.	A
-6304 Odor.	Pungent & nutty odor.	A
-6305 Melting point	171-174°C.	A
-7300 Density	0.55 g/ml (or g/cm^3)	A
-7840/60 Solubility	The solubility of captan to the following solvents (in g/100ml) are: water, < 0.5 ppm (25°C); acetone, 2.1; ethanol , <0.5; chloroform, 7.0; ; isopropanol, 0.17; xylene, 2.0; cyclohexanone, 2.3. MRID # 402312-01.	A
-7950 Vapor Pressure.	Data were not submitted.	Gap
- 7370 Dissociation Constant	N/A, captan is neither an acid nor a base. It is very low water solubility (0.50 ppm at 25°C).	N/A
-7550-7570. Octanol/ Water Partition Coefficient	Kow= 610 at 25°C.	A
-7000 pH	4.85 [1% solution in water/acetone (1:1, v/v)] at 25°C.	A
-6313 Stability	Captan technical is stable at ambient temperature up to 14 months. Thermal stability tested at 54°C for 2 weeks, no change is concentration was observed. UV irradiated at 254 nm for 240 hours, no significant change in concentration of the active ingredient was observed. The hydrolytic stability at 20°C at pH 4.0, 7.0, and 10.0 was 32.4, 8.3, and < 2 minutes, respectively. Carbon steel and stainless steel 304 coupons 50x3x3 mm size were closely contacted with 700 ml of test substance at 30- 40°C and incubated for 480 hours (20 days). The corrosion rate of carbon steel and stainless steel 304 was 0.14 and 0.02 mil per year, respectively.	A

A: acceptable; N/A: not applicable; Gap: data gap.

Pages 249-255 *Manufacturing process information may be entitled to confidential treatment*

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

September 21, 2000

Document Processing Desk (RED-SRRD-PRB)
Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047

RE: Captan Data Call-In Product Specific "Product Chemistry" Data Packages

Dear Ms. Jones:

We submitted two additional studies to fulfill the requirements of Captan Product Chemistry Data Packages on September 14, 2000. Due to a mistake in the formatting, please replace enclosed corrected version of "Enforcement Analytical Method for Captan Technical and Formulated Products" with that was submitted on September 14, 2000.

Thank you.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

C:\SLL Files\Captan\Registration\EPA\RED\DCI\prod chem\Cover letter 091400 to EPA DCI Product Chem.doc

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

September 14, 2000

Document Processing Desk (RED-SRRD-PRB)
Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

452162-00

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047

RE: **Captan Data Call-In Product Specific "Product Chemistry" Data Packages**

Dear Ms. Jones:

In respond to your recent request, we have included two additional studies to fulfill the requirements of Captan Product Chemistry Data Packages.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

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TRANSMITTAL DOCUMENT

1. Name and address of submitter

Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

2. Regulatory action in support of which this package is submitted.

EPA Data Call-in for reregistration of Captan.

3. Transmittal date

September 14, 2000.

4. List of submittal studies.

45210001 1. Preliminary Analysis - Captan Technical
45216201 2. Enforcement Analytical Method for Captan Technical and Formulated Products

Company Official: Desmond Byrne

Desmond Byrne, Signature
Exe. Director of Registrations & Regulatory Affairs

Company Name: Tomen Agro, Inc.

Company Contact: Shih-Lo Lee

Phone: (415)-536-3467
Fax: (415)-284-9884
E-mail: slee@agro.sfr.tomen.com

Administrative

Materials

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

TOMEN AGRO INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 09/15/00. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [02] :

* Your Statement of No Data Confidentiality Claims is contradicted by the marking(s) on page(s) 5-31 of the study. If you do not intend to make Supplemental Claims of Data Confidentiality you can explicitly override these markings when you resubmit this study.

TomenAgro

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

452100-00

September 14, 2000

Document Processing Desk (RED-SRRD-PRB)
Office of Pesticide Program (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Ms. Karen Jones
Chemical Review Manager Team 81
Phone: 703-308-8047

RE: Captan Data Call-In Product Specific "Product Chemistry" Data Packages

Dear Ms. Jones:

In respond to your recent request, we have included two additional studies to fulfill the requirements of Captan Product Chemistry Data Packages.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Attachment

cc: D. Byrne
files:Cap/USA/RED
files:Cap/USA/R

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TRANSMITTAL DOCUMENT

1. Name and address of submitter

Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

2. Regulatory action in support of which this package is submitted.

EPA Data Call-in for reregistration of Captan.

3. Transmittal date

September 14, 2000.

4. List of submittal studies.

45210001 1. Preliminary Analysis - Captan Technical
REJ (02) 2. Enforcement Analytical Method for Captan Technical and Formulated Products

Company Official: Desmond Byrne

Desmond Byrne, Signature
Exe. Director of Registrations & Regulatory Affairs

Company Name: Tomen Agro, Inc.

Company Contact: Shih-Lo Lee

Phone: (415)-536-3467
Fax: (415)-284-9884
E-mail: slee@agro.sfr.tomen.com

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PS Form **3800**, April 1995

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102595-99-M-0079

PS Form **3800**, April 1995 *(Reverse)*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 21 2000

CERTIFIED MAIL

Ms. Shih-Lo Lee
Captan Product Manager
Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan Reregistration Eligibility Document
Review of Product Chemistry Data

Product Registrations: Captan Technical (EPA Reg. No. 66330-31)
Captan 90 Dust Base (EPA Reg. No. 66330-34)

Dear Ms. Lee:

The Agency has reviewed the product chemistry data submitted in response to the Captan RED. The Agency's conclusions are as follows:

EPA Reg. No. 66330-31: The submitted data (MRIDs 40021301 and 45192312) are acceptable and fulfill the data requirements for Guideline Series 61, 62, and 63, **except for Guidelines 61-2b Description of Manufacturing Process, 62-1 Preliminary Analysis, 62-3 Enforcement Analytical Method, and 63-9 Vapor Pressure. Data are required for these guidelines.** Data requirements for Guidelines 61-1 Product Identity and Composition and 62-2 Certified Limits depend upon the approval of the Confidential Statement of Formula. The Confidential Statement of Formula **must be revised.** Please refer to **Findings 2b and 3b** of the enclosed Agency review for details.

EPA Reg. No. 66330-34: The submitted data (MRIDs 40021301 and 45192314) are acceptable and fulfill the data requirements for Guideline Series 61, 62, and 63, **except for Guidelines 61-2b Description of Manufacturing Process, 62-1 Preliminary Analysis, 62-2 Certified Limits, and 63-9 Vapor Pressure. Data are required for these guidelines.** The Confidential Statement of Formula **must be revised.** Please refer to **Findings 2b, 2c, 2d, 2e, and 3b** of the enclosed Agency review for details.

CONCURRENCES

SYMBOL	7508C	7508C						
SURNAME	KJones	Propst						
DATE	9/20/00	9/20/00						

*U.S. Government Printing Office: 1992 — 620-856/40672

Copies of the Agency's reviews are enclosed for your records. Within **60 days** from receipt of this letter, you are required to submit the outstanding product chemistry data and the revised CSFs. Failure to comply may result in a Notice of Intent to Suspend for your captan product registrations. If you have any questions, please contact Karen Jones at (703) 308-8047.

Sincerely,

/S/

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and
Reregistration Division

Enclosures

DATE OUT: 14/SEP/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Technical Product [x], End-Use Product []
BARCODE No. : D268546 ; **CASE No.:** 003582 ;**EPA RECEIVED DATE:** 18/AUG/00; **REG./File Symbol No.:** 66330-31; **PRODUCT NAME:** Captan Technical; **COMPANY NAME:** Tomen Agro, Inc. ;**Action Code:** 674 8-Month Response to Product Specific Data Call-In

FROM: Paul Horng, Ph. D., Chemist
Product Chemistry Team
Product Reregistration Branch
Special Review and Reregistration Division (7508C)
Office of Pesticide Program

Paul Horng

TO: Karen Jones, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)
Office of Pesticide Program

INTRODUCTION:

The registrant, Tomen Agro, Inc., submitted the product chemistry data in MRIDs # 400213-01 and 451923-12; the Confidential Statement of Formula (CSF), a basic formulation dated 30/JUN/00; and a draft label received by the Agency on 18/AUG/00; requesting for reregistration of Captan Technical, Reg. No. 66330-31.

FINDINGS:

1. The Reregistration Eligibility Decision (RED) for Case # 0120 was issued November 2, 1999 for the Technical Grade Active Ingredient (TGAI) captan. The Agency has completed its reregistration eligibility decision and determined that captan products labeled and used as specified in this RED will not pose unreasonable risks of adverse effects to humans and the environment. Therefore, the Agency has concluded that products containing captan are eligible for reregistration, subject to the terms and conditions of this RED, except for those with uses on turf and aerially-applied wettable powder formulations. Products applied to turf at sod farms or golf courses are eligible for reregistration; uses at other turf sites are being voluntarily canceled. Wettable powder formulations that are applied aerially are eligible for reregistration, provided either: (1) the products are packaged in water soluble packaging; or (2) the application rates are reduced to a level that is not higher than 1.2 lb ai/A. The product chemistry generic data base supporting the reregistration of captan TGAI has been reviewed and determined to be substantially complete. No data gap was cited.

2(a). Except for the data gaps noted in # 2(b), the submitted data in MRID #400213-01 satisfy the data requirements for Guidelines, 61-2a (830-1600, Description of Materials Used to Produce the Product) and 61-3 (830-1670, Discussion of Formation of Impurities). The submitted data in MRID # 451923-12 satisfy the data requirements for Guidelines 63-2 (830-6302, Color), 63-3 (830-6303, Physical State), 63-4 (830-6304, Odor), and 63-5 (830-7200, Melting Point), 63-7 (830-7300, Density), 63-8 (830-7860, Solubility), 63-11 (830-7550-7570, Octanol/Water Partition Coefficient), 63-12 (830-7000, pH), and 63-13 (830-6313, Stability). Data for Guidelines 63-10 (830-7370, Dissociation Constant in Water) are not applicable to the captan technical and are not required.

2(b). No data were submitted for the Guidelines 62-1 (830-1700, Preliminary Analysis), 62-3 (830-1800, Enforcement Analytical Method), 63-9 (830-7950, Vapor Pressure) and are still outstanding. Data requirements for guidelines 61-1 (830-1550, Product Identity and Composition) and 62-2 (830-1750, Certified Limits) depends upon the approval of the CSF. For the data requirement Guideline 61-2b (830-1620, Description of Manufacturing Process), the registrant must provide more information about what changes in manufacturing process, such as upgrade of the manufacturing equipment, change of reaction process, addition of catalyst, or improvement of the purification process, make the captan concentration increase from 90% to 91.5%.

3(a). Except for a minor revision required for the CSF as noted in 3(b), the submitted CSF, a basic formulation 30/JUN/2000, has been filled out completely and correctly. The CSF and certified limits of the product depend upon the approval of the data of preliminary analysis.

3(b). (1) The term "Other Related Derivatives" in the third row of the CSF is suggested to change to "Other Derivatives" to avoid confusing with "AI Related Derivatives". (2) If the "Other Related Derivatives" have fungicide activity, then, they are suggested to be combined in the same term "AI Related Derivatives".

4(a). Except for some revisions required for the draft label as noted in 4(b), the ingredient statement is acceptable. The physical and chemical property data of the product has shown the product has neither Physical nor chemical hazard, therefore, no physical or a chemical hazard statement is required on the label.

4(b). Some revisions are required for the draft label. (1) The statement "Do not contaminate with water, food, or feed by storage and disposal." currently inside the storage statement must be moved out and placed directly under the Storage and Disposal heading. (2) The statement of Pesticide Storage should be revised to read " Pesticide Storage: Store the product in a cool and dry place." (5) Pesticide Disposal statement should be revised by deleting the sentence "Pesticide wastes are acutely hazardous." from the statement. The revisions of the draft label can be done after label review.

RECOMMENDATIONS:

Except for the data gaps noted in Finding # 2(b) and a minor revision required for the CSF as noted in Finding # 3(b), the registrant has satisfied all product chemistry data requirements for reregistration of this subject product. Once the outstanding data have been submitted and satisfies, the revision of the CSF has been made, the Agency will have no objection to the reregistration of Captan Technical, EPA Reg. No. 66330-31.

Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)
MRID # 451923-12.

GUIDELINE NO.(GRN)	DESCRIPTION/ METHODS USED WHERE APPLICABLE AND REFERENCES	Comments
-6302 Color.	Cream color.	A
-6303 Physical State.	Solid at 20°C.	A
-6304 Odor.	Pungent & nutty odor.	A
-6305 Melting point	171-174°C.	A
-7300 Density	0.55 g/ml (or g/cm^3)	A
-7840/60 Solubility	The solubility of captan to the following solvents (in g/100ml) are: water, < 0.5 ppm (25°C); acetone, 2.1; ethanol , <0.5; chloroform, 7.0; ; isopropanol, 0.17; xylene, 2.0; cyclohexanone, 2.3. MRID # 402312-01.	A
-7950 Vapor Pressure.	Data were not submitted.	Gap
- 7370 Dissociation Constant	N/A, captan is neither an acid nor a base. It is very low water solubility (0.50 ppm at 25°C).	N/A
-7550-7570. Octanol/ Water Partition Coefficient	Kow= 610 at 25°C.	A
-7000 pH	4.85 [1% solution in water/acetone (1:1, v/v)] at 25°C.	A
-6313 Stability	Captan technical is stable at ambient temperature up to 14 months. Thermal stability tested at 54°C for 2 weeks, no change is concentration was observed. UV irradiated at 254 nm for 240 hours, no significant change in concentration of the active ingredient was observed. The hydrolytic stability at 20°C at pH 4.0, 7.0, and 10.0 was 32.4, 8.3, and < 2 minutes, respectively. Carbon steel and stainless steel 304 coupons 50x3x3 mm size were closely contacted with 700 ml of test substance at 30- 40°C and incubated for 480 hours (20 days). The corrosion rate of carbon steel and stainless steel 304 was 0.14 and 0.02 mil per year, respectively.	A

A: acceptable; N/A: not applicable; Gap: data gap.

Pages 271-273 *Manufacturing process information may be entitled to confidential treatment*

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☑ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Tomen Agro, Inc. / 66330-31	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification ☑ None ☐ Restricted
4. Company/Product (Name) Tomen Agro, Inc. / Captan Technical	PM# 22	
5. Name and Address of Applicant *(Include ZIP Code)* Tomen Agro, Inc. 100 First Street, Suite 1700 San Francisco, CA 94105 ☐ *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

☐ Amendment - Explain below.
● Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☑ Other - Explain below.

Explanation: Use additional page(s) if necessary. *(For section I and Section II.)*
Re-registration

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information ☐ Label ☐ Container	4. Size(s) Retail Container	5. Location of Label Directions ☐

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Shih-Lo Lee	Project Manager	(415) 536-3467

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Desmond Byrne	3. Title Executive Director, Registrations and Regulatory Affairs
4. Typed Name Desmond Byrne	5. Date 3 August, 2000

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENTS:	**By Wt**
Captan*	~~88.0~~91.5%
Related Derivatives	2.0%
INERT INGREDIENTS:	~~10.0~~6.5%
TOTAL	100.0%

* N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide.

EPA Reg. No.: - 66330-31
EPA Est. No.: 66330-OH-1

Net Contents: 25 kg (55.1 lb)

KEEP OUT OF REACH OF CHILDREN

DANGER
CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE
HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

MADE IN THE U.S.A.

TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1700
SAN FRANCISCO, CA 94105

~~STATEMENT OF PRACTICAL TREATMENT~~FIRST AID

~~FIRST AID:~~

IF IN EYES: ~~Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.~~Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: ~~Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.~~Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: ~~Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, no not give anything by mouth and do not induce vomiting.~~Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: ~~Wash with plenty of soap and water. Get medical attention~~ Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
(800)-- 228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin.~~May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling.~~ Avoid breathing dust. Avoid contact with eyes, skin and clothing. ~~Remove contaminated clothing and separately wash clothing before reuse.~~May cause allergic skin reactions.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480.

Only for formulation into a fungicide for the following use(s):

~~1.FOOD USE SITES~~

Seed Treatments:

Alfalfa
Barley
Beans (snap, cowpeas, lentils, soybeans)
Beets (table and sugar)
Bluegrass
Broccoli
Brussels Sprouts
Cabbage
~~Cantaloupe~~
Carrots
Cauliflower
~~Cereal Grains~~
~~Barley, Rye~~
~~Oats~~
~~Wheat~~
Clover
Collards
Corn (field, ~~pop~~and, sweet)
Cotton
~~Cowpea~~

Cucumbers
Eggplant
Flax
Grasses
~~Honeydew~~
Kale
~~Lentils~~
Lespedeza
Lettuce
Melons (cantaloupe, honeydew, watermelon and mush melons
Milo
~~Muskmelons~~
Mustard Greens
Oats
Okra
Onions
Peanuts
Peas
Peppers
Potato (Seed Piece)

Pumpkins
Radish
Rape
Rutabaga
Rye
Safflower
Sesame
Shallots
Sorghum (milo and hulled)
~~Soybeans~~
Spinach
Squash
~~Sugar Beets~~
Sunflowers
Swiss Chard
Tomato
~~Taro (Corm)~~
Trefoil
Turnip
~~Watermelon~~
Wheat

~~Fruit & Nut Crops:~~Foliar Treatment:

Almonds	Grapes	Plums (Fresh Prunes)
Apples	Nectarines	~~Raspberries~~Caneberries (raspberries, blackberries, dewberries
Apricots	Peaches	Strawberries
Blueberries	~~Pears (post harvest only)~~	
Cherries		

Post-Harvest Dip:

Apple	Cherries	Pears

Pre-Plant Root Dip:

Peaches

NON-FOOD ~~USE SITES~~/ORNAMENTALS:

~~Ornamental Plants:~~

Azaleas	Conifers ~~(ornamental only)~~	~~Ornamental~~ Flowering Plants
Begonias	Dichondra	Roses
Camellias	Gladiolus	~~Soil (lawn seedbeds and Greenhouse Bench)~~
Carnations	~~Grasses (in lawns and turfs, non-pasturing areas)~~Turf (sod farm and golf course)	
Chrysanthemums		

~~Indoor, Industrial Uses:~~Soil:

Seed beds and greenhouse bench treatment

Indoor/Industrial:

Paints	Plastics	Adhesives
Coatings		

~~3.Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and~~

~~4.Uses for experimental purposes that are in compliance with USEPA requirements.~~

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may be used to formulate products for any additional use(s) not listed on the MP label if the fromulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse. Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE TO BUYER AND USER: --

CONDITIONS OF SALE: 1. Tomen Agro, Inc. warrants that this product conforms to the chemical description on the label
and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. **TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.

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

AUG 1 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CERTIFIED MAIL

Ms. Shih-Lo Lee
Captan Product Manager
Tomen Agro, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Subject: Captan Reregistration Eligibility Document
Review of Time Extension Request

Product Registrations: EPA Reg. Nos. 66330-3, 66330-9, 66330-11, 66330-14, 66330-15, 66330-17, 66330-18, 66330-19, 66330-20, 66330-21, 66330-22, 66330-24, 66330-25, 66330-26, 66330-27, 66330-28, 66330-29, 66330-30, 66330-31, 66330-32, and 66330-34

Dear Ms. Lee:

The Agency has received your letter dated July 24, 2000 in which you requested a time extension until December 31, 2000 for submission of acute toxicity data to support the reregistration of Tomen's captan products. Based on the justification provided in your letter, the Agency is hereby granting your time extension request. If you have any questions, please contact Karen Jones at (703) 308-8047.

Sincerely,

Linda S. Propst

Linda S. Propst, Chief
Product Reregistration Branch
Special Review and
Reregistration Division

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (40% Postconsumer)

TomenAgro

FACSIMILE TRANSMISSION

TOMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105
(415) 536-3480 FAX: (415) 284-9883

To: Karen Jones (EPA)
Fax #: 703-308-7070
Phone: 703-305-8047
From: Shih- Lo Lee

Total pages: 1
cc: D. Byrne
Files: Captan/R/RED

Date: July 24, 2000

Subject: **CAPTAN- Data Call-In Submission Extension Application**

Dear Ms. Jones:

Tomen Agro Inc. would like to apply for an extension for submission of product specific data to support the reregistration of Tomen's Captan product. We have completed the product chemistry data package as required for the reregistrations. Data packages for product chemistry will be submitted to you along with the required forms (8570-1, 8570-34 and 8570-35), labels and confidential statement of formulas (8570-4).

We have entered into agreements to cost-share "acute toxicity" data packages with Trace, Platte,Wilbur-Ellis and Gustafson. Tomen Agro Inc. has also offered to share data to support our subregistrants (Loveland, Wilfarm, Arpentia, Rockland and others). We have been informed by Trace Chemicals that they have obtained an extension of the submission until December 31, 2000. Therefore Tomen would also like to apply for an extension to the same date, December 31, 2000.

Sincerely,

Shih-Lo Lee
Captan Project Manager
Tomen Agro, Inc.
Phone: 415-536-3467
Fax: 415-284-9884
E-mail: slee@agro.sfr.tomen.com

United States Environmental Protection Agency
Washington, D. C. 20460

DATA CALL-IN RESPONSE

Form Approved

OMB No. 2070-0107
2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company name and Address	2. Case # and Name	3. Date and Type of DCI
TOMEN AGRO INC 100 FIRST STREET, SUITE 1610 SAN FRANCISCO CA 94105	0120 Captan	PRODUCT SPECIFIC

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily.	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is a MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
66330-31		N.A.	N.A.	X	

8. Certification

I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative D. Byrne Executive Director, Registration & Regulatory Affairs

9. Date 2/28/00

10. Name of Company Contact Shih-Lo Lee

11. Phone Number (415) 536-3467

United States Environmental Protection Agency
Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company name and Address
TOMEN AGRO INC
100 FIRST STREET, SUITE 1610
SAN FRANCISCO CA 94105

2. Case # and Name
0120 Captan
EPA Reg. No. 66330-31

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 66330-RD-8101

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
	Prod Chem - Regular Chemical								
830.1550	Product identity & composition (1)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.1600	Descriptn materials used to produce the product (1,2)					ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
830.1620	Description of production process (1,2,52)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.1650	Description of formulation process (1,2)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.1670	Discussion of formation of impurities (1,3)					ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
830.1700	Preliminary analysis (1,4,52)					ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
830.1750	Certified limits (1,5)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.1800	Enforcement analytical method (1,53)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.6302	Color (51)					ABCDEFGHIJKLMNO	MP	8 mos.	1
830.6303	Physical state					ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
830.6304	Odor (51)					ABCDEFGHIJKLMNO	MP	8 mos.	1

10. Certification
I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative D. Blum Executive Director, Registration + Regulatory Affairs

11. Date 2/28/00

12. Name of Company Contact
Shih-Lo Lee

13. Phone Number
(415) 536-3467

United States Environmental Protection Agency
Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company name and Address
TOMEN AGRO INC
100 FIRST STREET, SUITE 1610
SAN FRANCISCO CA 94105

2. Case # and Name
0120 Captan

EPA Reg. No. 66330-31

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 66330-RD-8101

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
		(6)					ABCDEFGHIJKLMNO	TGAI	8 mos.	
830.7000	pH	(9)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
830.7100	Viscosity	(13)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
		(7)					ABCDEFGHIJKLMNO	TGAI	8 mos.	
830.7300	Density						ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
830.6314	Oxidation/reduction: chemical incompatability	(10)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
830.6315	Flammability	(11)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
830.6316	Explodability	(12)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
830.6317	Storage stability	(18)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
		(13)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	
830.6319	Miscibility	(50)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
830.6320	Corrosion characteristics						ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
830.6321	Dielectric breakdown voltage	(15)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
	Acute Toxic - Regular Chemical									
870.1100	Acute oral toxicity	(1,37)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
870.1200	Acute dermal toxicity	(1,2,37)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1
870.1300	Acute inhalation toxicity	(3)					ABCDEFGHIJKLMNO	MP/EP and TGAI	8 mos.	1
870.2400	Acute eye irritation	(2)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7
870.2500	Acute dermal irritation	(1,2)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	1

Initial to indicate certification as to information on this page (full text of certification is on page one). DB

Date 2/28/00

United States Environmental Protection Agency
Washington, D. C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Form Approved
OMB No. 2070-0107
2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company name and Address
TOMEN AGRO INC
100 FIRST STREET, SUITE 1610
SAN FRANCISCO CA 94105

2. Case # and Name
0120 Captan

EPA Reg. No. 66330-31

3. Date and Type of DCI
PRODUCT SPECIFIC
ID# 66330-RD-8101

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame	9. Registrant Response
870.2600	Skin sensitization (4)					ABCDEFGHIJKLMNO	MP/EP	8 mos.	7

Initial to indicate certification as to information on this page (full text of certification is on page one). DB

Date 2/28/00

United States Environmental Protection Agency
Washington, D. C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 0120 Captan

Key: MP = manufacturing-use product; EP = end-use product; provided formulators purchase their active ingredient(s) from a registered source, they need not submit or cite data pertaining to the purchased product.[NOTE: If a product is a 100 percent repackage of another registered product, registrants are not subject to any data requirements identified in the tables.]; TEP = typical end-use product;TGAI = technical grade of the active ingredient; PAI = "pure" active ingredient; PAIRA = "pure" active ingredient, radiolabeled.

Use Categories Key:

A - Terrestrial food crop	B - Terrestrial food feed crop	C - Terrestrial nonfood crop	D - Aquatic food crop	E - Aquatic nonfood outdoor
F - Aquatic nonfood Industrial	G - Aquatic nonfood residential	H - Greenhouse food crop	I - Greenhouse nonfood crop	J - Forestry
K - Residential outdoor	L - Indoor food	M - Indoor nonfood	N - Indoor Medical	O - Indoor residential

Footnotes: [The following notes are referenced in column two (5. Study Title) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

Prod Chem - Regular Chemical

1 Requirements pertaining to product identity, composition, analysis, and certification of ingredients are detailed further in the following sections: *158.155 for product identity and composition (61-1); *158.160, 158.162, and 158.165 for description of starting materials and manufacturing process (61-2); *158.167 for discussion of formation of impurities (61-3); *158.170 for preliminary analysis (62-1); *158.175 for certification of limits (62-2); and *158.180 for enforcement analytical methods (62-3).
2 A schematic diagram and/or brief description of the production process will suffice if the pesticide is not already under full scale production and an experimental use permit is being sought.
3 If the pesticide is not already under full scale production and an experimental use permit is sought, a discussion of unintentional ingredients shall be submitted to the extent this information is available.
4 To support registration of an MP or EP, whether produced by an integrated system or not, the technical grade of Active Ingredient must be analyzed. If the technical grade of Active Ingredient cannot be isolated, a statement of composition of the practical equivalent of the technical grade of Active Ingredient must be submitted. Data on EPs or MPs will be required on a case-by-case basis.
5 Certified limits are not required for inert ingredients in products proposed for experimental use.
6 Required if technical chemical is solid at room temperature.
7 Required if technical chemical is liquid at room temperature.
9 Required if test substances are dispersible with water.
10 Required if product contains an oxidizing or reducing agent.
11 Required if product contains combustible liquids.
12 Required if product is potentially explosive.
13 Required if product is a liquid.
15 Required if end-use product is liquid and is to be used around electrical equipment.
18 Required for MP and EP but should not be submitted for EP unless (a) efficacy data are required to be submitted, (b) the storage stability data show that the active ingredient(s) is (are) not within the certified limits or toxicologically significant degradates are detected, or (c) product instability is suspected or incidents of instability are reported. Refer to PR Notice 92-5 for more information.
50 Required if product is an emulsifiable liquid and is to be diluted with water.
51 Required for MP. Refer to PR Notice 92-5.
52 Required for all non-integrated products.
53 Required for all non-integrated products and on a case-by-case basis for integrated products.

United States Environmental Protection Agency
Washington, D. C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 0120 Captan

Footnotes (cont.):

Acute Toxic - Regular Chemical

1 Not required if test material is a gas or highly volatile.
2 Not required if test material is corrosive to skin or has pH less than 2 or greater than 11.5; such a product will be classified as Toxicity Category I on the basis of potential eye and dermal irritation effects.
3 Required if the product consists of, or under conditions of use will result in, an inhalable material (e. g., gas, volatile substances, or aerosol/particulate).
4 Required unless repeated dermal exposure does not occur under conditions of use.
37 Testing of the EP dilution in addition to the EP or MP is required if it can be reasonably anticipated that the results of such testing may meet the criteria for restriction to use by certified applicators specified in 40 CFR 152.170(b) or the criteria for initiation of special review specified in 40 CFR 154.7 (a)(1).

File
66330-31

REQUEST FOR 6(a)(2) SCREEN

DATE: 5/20/99 **WEEK OF 5/7/99** **LEAD OFFICE: RD**

FROM: Kathleen O'Malley
Information Services Branch/IRSD

TO: **XX___Hank Spencer (HED/Tox, Onco, Residue, Product Chem)**

___ Jerry Blondell (HED/Animal Safety, Human Health)

___ John Redden (RD/Products - Acute Tox) ___ Bill Schneider (BPPD)

___Hardip Singh (EFED) ___Norm Cook (AD/Sub-Chronic/Chronic Tox, Human Exposure, Residue, Eco-Tox & Env. Fate)

___Michele Wingfield (AD/Efficacy) ___Ian Blackwell (AD/Products - Acute Tox)

_____ Mark Perry (SRRD/Products - Acute Tox)

Attached are copies of transmittal letters and/or study conclusions of recently received 6(a)(2) data submissions. Please screen this information and provide me with the results by hand/mail/fax delivery of this screen cover sheet with your comments to me in Room 216 CM2 (7502C), Fax: 305-7670.

IDENTIFICATION NUMBER: **43393502 (OLD ADV. FLAG SUBMISSION)**

PRODUCT REGISTRATION NUMBER:

CHEMICAL NAME: **CAPTAN**

DESCRIPTION: **Captan: a CTL Re-examination of Slides: Oral Oncogenicity: Mice**

Briefly describe the adverse effect:

Does this submission warrant an expedited review?___Yes _xxx__No - Routine Review

If yes, explain:

Expedited review is appropriate if the results change our regulatory position on this chemical or product. Examples are:

Acute Tox - label change or change in tox category

If end point is more sensitive than current basis for regulatory position

Antimicrobial Product Efficacy Failure - label change: reduced claims or dosage increased

158.134 Flagging Statement is positive

If expedited, recommended timeframe for review:

Other Comments:
Please respond by___5/25/99_____

Henry Spencer 5/25/99

Signature Date

DP BARCODE: D256654

CASE: 003582 DATA PACKAGE RECORD DATE: 06/08/99
SUBMISSION: S563195 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 405 6(A)(2) ADVERSE DATA
RANKING : 0 POINTS ()
CHEMICALS: 081301 Captan (ANSI) 90.0000%

ID#: 066330-00031 CAPTAN TECHNICAL
COMPANY: 066330 TOMEN AGRO INC
PRODUCT MANAGER: 22 CYNTHIA GILES-PARKER 703-305-7740 ROOM: CM2 249
PM TEAM REVIEWER: CYNTHIA GILES-PARKER 703-305-7740 ROOM: CM2 249
RECEIVED DATE: 06/01/99 DUE OUT DATE: 08/10/99

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 256654 EXPEDITE: Y DATE SENT: 06/08/99 DATE RET.: / /
CHEMICAL: 081301 Captan (ANSI)
DP TYPE: 001 Submission Related Data Package
CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: / /
DIV : HED	/ /	/ /	NEGOT DATE: / /
BRAN: CEB2	/ /	/ /	PROJ DATE: / /
SECT: IO	/ /	/ /	
REVR :	/ /	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

ATTENTION: SANJU DIWAN

Attached is a copy of an old study that was flagged by the 6(a)(2) Screening Team and delivered to me last week. The MRID associated with this study is 433935-00(cover letter) and 433935-02. This study was submitted in respsonse to the Agency's proposal to revoke toleances in 1994.

I believe that study has probably been reviewed in conjunction with the RED Chapter, but please confirm. Since the attached information was sent to me on last week, and has been flagged as ADVERSE DATA under 6(a)(2), I want to make sure that this has not been overlooked. Thank You, Cynthia 305-7740

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

S563195
D256654

REQUEST FOR 6(a)(2) SCREEN

DATE: 5/20/99 **WEEK OF 5/7/99** **LEAD OFFICE: RD**

FROM: Kathleen O'Malley
Information Services Branch/IRSD

TO: **XX___Hank Spencer (HED/Tox, Onco, Residue, Product Chem)**

___ Jerry Blondell (HED/Animal Safety, Human Health)

___ John Redden (RD/Products - Acute Tox) ___ Bill Schneider (BPPD)

___Hardip Singh (EFED) ___Norm Cook (AD/Sub-Chronic/Chronic Tox, Human Exposure, Residue, Eco-Tox & Env. Fate)

___Michele Wingfield (AD/Efficacy) ___Ian Blackwell (AD/Products - Acute Tox)

_____ Mark Perry (SRRD/Products - Acute Tox)

Attached are copies of transmittal letters and/or study conclusions of recently received 6(a)(2) data submissions. Please screen this information and provide me with the results by hand/mail/fax delivery of this screen cover sheet with your comments to me in Room 216 CM2 (7502C), Fax: 305-7670.

IDENTIFICATION NUMBER: **43393502 (OLD ADV. FLAG SUBMISSION)**

PRODUCT REGISTRATION NUMBER:

CHEMICAL NAME: **CAPTAN**

DESCRIPTION: **Captan: a CTL Re-examination of Slides: Oral Oncogenicity: Mice**

Briefly describe the adverse effect:

Does this submission warrant an expedited review?___Yes _xxx__No

If yes, explain:

Expedited review is appropriate if the results change our regulatory position on this chemical or product. Examples are:

Acute Tox - label change or change in tox category

If end point is more sensitive than current basis for regulatory position

Antimicrobial Product Efficacy Failure - label change: reduced claims or dosage increased

158.134 Flagging Statement is positive

If expedited, recommended timeframe for review:

Other Comments:
Please respond by___5/25/99_____

Henry Spencer 5/25/99

Signature Date

old study found to have Adverse Flagging

NOTICE OF RECEIPT OF 6(a)(2) SUBMISSION

FROM: Information Services Branch
Information Resources and Services Division

TO: C. Giles-Parker

S563195
D256654

The 6(a)(2) Team has taken steps to get this screened by the appropriate science staff.

Screening determines the priority and timeframe for review.

As soon as screen results are received by ISB, you will be informed by your division 6(a)(2) Team representative. This information will determine instructions for review.

Please do not put this study or letter into review until you receive screen results and review instructions from your division 6(a)(2) Team representative.

If you have any questions, please contact Kathleen O'Malley. She is located in Room 216 CM2 and can be reached on 305-5411.

BB552

56131
Captan Task Force

081301
C. Giles Parker
H. Rothwell

EPA

MRID NUMBER

433935-01

ZENECA

ZENECA Ag Products
1800 Concord Pike
Wilmington
Delaware 19897

Telephone (302) 886-1000
Telex 6703211?
Fax (302) 886-1957

CERTIFIED MAIL

433935-00

October 3, 1994

Ms. Joanne Miller
Product Manager 23
Office of Pesticide Programs
Document Processing Desk
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Miller:

Subject: CAPTAN
Toxicology Data
Submitted in Response to 59 FR 33941, EPA's Proposal to Revoke 40 CFR 185.500
Guideline Reference No. 83-2
Supplemental Information to Guideline Reference Nos. 83-1, 83-2, 84-2, and 84-4

Enclosed are 16 volumes that were submitted by the Captan Task Force as attachments to comments on EPA's *Proposed Rule Revoking Certain Food Additive Regulations*, 59 FR 33941 (July 1, 1994). These 16 volumes include laboratory studies not previously reviewed by the agency and published literature articles. A summary of the new data and the technical rationale are included in Volume 1. New data includes DNA-Binding studies, Mechanism of Action Studies, Re-examination of pathology slides, and statistical analyses across a range of studies including additional historical control data from laboratories performing tests.

These data support the Task Force's position that captan does not induce cancer. New studies confirm captan is <u>not</u> a genotoxic carcinogen proven in *in vivo* testing. New studies establish a threshold NOEL for the mechanism of action in mice. Statistical analyses utilizing additional historical control data not previously available to the agency confirm the lack of statistical and biological significance of tumor incidence in rats.

The Task Force would be pleased to provide the Agency with additional information related to this submission or the comments to 59 FR 33941. We would appreciate receiving MRID numbers for the enclosed volumes. We trust this submission is in order but should there be any questions or comments, please contact me at 615-982-9076.

Sincerely,

Becky Rhodes

Becky Rhodes
CAPTAN TASK FORCE CHAIRMAN

cc: Dana Sargent
Andy Elmania

1 of 3

DATA TRANSMITTAL DOCUMENT

1. Name and address of submitter

ZENECA Inc.
ZENECA Agricultural Products
1800 Concord Pike
Wilmington, DE 19897

2. Regulatory action in support of which this package is submitted

CAPTAN
Toxicology Data
Submitted in Response to 59 FR 33941, EPA's Proposal to Revoke 40 CFR 185.500
Guideline Reference No. 83-2
Supplemental Information to Guideline Reference Nos. 83-1, 83-2, 84-2, and 84-4

3. Transmittal date

October 3,1994

4. List of submitted studies

Vol. 1 Gordon, E.B., *et al.* "Response to 59 FR 33941 Summary Data Concluding Captan is Not a Human Carcinogen", September 29, 1994.
Reject (c1)

Vol. 2 Pritchard, D.J. and Lappin, G.J., "Captan: DNA Binding Study In The Mouse", Guideline No. NA, ICI Americas, Inc., Report No: CTL/P/3380, Study No. UM0331, August 23, 1991, 69 pages.
Reject (c2)

Vol. 3 Provan, W.M., Eyton-Jones, H., and T. Green, "The Potential of Captan to React with DNA", Guideline No. NA, ICI Central Toxicology Laboratory, Report No. CTL/R/1131, November 16, 1982, 30 pages.
43393581

Vol. 4 Chidiac, P. and M.T. Goldberg, (1986), "Lack of Induction of Nuclear Aberrations by Captan in Mouse Duodenum", Guideline No. NA, Laboratory NA, Report No. NA, August 21, 1986, 13 pages.
Reject (c4)

Adv. Flag

Vol. 5 Robinson, M., "Captan: A CTL Re-examination of Duodenal Sections From A Lifetime Oral Oncogenicity Study in Mice (Bio/Dynamics Project No. 80-8481)", Guideline No. 83-2, Zeneca Central Toxicology Laboratory, Cheshire, UK, Report No. CTL/T/2829, September 23, 1994, 11 pages.
43393502

Vol. 6 Allen, S.L., "Captan: Investigation of Duodenal Hyperplasia in Mice", Guideline No. NA, Zeneca Central Toxicology Laboratory, Report No. CTL/L/5674, April 12, 1994, 12 pages.
43393503

BEST AVAILABLE COPY

3

Vol. 7 Foster, J.R., "Captan: Second Investigation Of Duodenal Hyperplasia
4339 3564 In Mice", Guideline No. NA, Zeneca Central Toxicology Laboratory, Report No. CTL/L/6022, September 23, 1994, 19 pages.

Vol. 8 Haseman, J.K., *et al.*, "Use of Dual Control Groups to Estimate False Positive
Reject (08) Rates in Laboratory Animal Carcinogencity Studies", Guideline No. NA, CAPTAN TASK FORCE, Report No. NA, 1986, 14 pages.

Vol. 9 Huff, James, Joseph Cirvello, Joseph Haseman and John Bucher, "Chemical Associated With Site-Specific Neoplasia In 1394 Long-Term
Reject (09) Carcinogenesis Experiments In Laboratory Rodents", Guideline No. NA, Laboratory NA, Report No. NA, 1991, 26 pages.

Vol.10 Anisimov, Vladimir N. *et al.*, "Carcinogenic Effect Of N-Nitrosotriethylurea In Single Administration To Female Rats," Guideline
Reject (10) No. NA, Laboratory NA, Report No. NA, 1988, 6 pages.

Vol.11 Owen, P.E., J.R. Glaister, I.F. Gaunt and D.H. Pullinger, "Inhalation Toxicity Studies with 1,3-Butadiene 3 Two Year Toxicity/Carcinogencity Study In Rats",
Reject (11) Guideline No. NA, Laboratory NA, Report No. NA, May 1987, 10 pages.

Vol.12 Anisimov, Vladimir and Galina Yu Ostpova, "Carcinogenesis Induced By Combined Neonatal sure to 5-Bromo-2'-Deoxyuridine and
Reject (12) Subsequent Total-Body X-Ray Irradiation In Rats", Guideline No. NA, Laboratory NA, Report No. NA,1993, 13 pages.

Vol.13 Rubin, Emanuel, M.D. and John L. Farber, M.D., "Pathology - Second Edition," Guideline No. NA, Laboratory NA, Report No. NA, 1994, 6
4339 3545 pages.

Vol.14 Cotran, Ramzi S. M.D., *et al*, "Robbins Pathologic Basis Of Disease",
4339 3546 Guideline No. NA, Laboratory NA, Report No. NA, 1989, 11 pages.

Vol.15 Castro, Victor F., M.D., *et al*, "Induced Mesenchymal Tumors Of The Rat Genital Tract", Guideline No. NA, Laboratory NA, Report No. NA,
Reject (15) 1988, 9 pages.

Vol.16 Leininger, Joel R. and Michael P. Jokinen, "Oviduct, Uterus, and
4339 3507 Vagina", Guideline No. NA, Laboratory NA, Report No. NA, 1990, 20 pages.

Company Official: Becky Rhodes (Name) — Becky Rhodes (Signature)

Company Name: ZENECA Inc.

Company Contact: Becky Rhodes (Name) — (615) 982-9076 (Telephone)

7

EPA

Supplement
~~to~~
~~43393~~

MRID NUMBER

R433935.02

Zeneca Inc
Agricultural Products
Wilmington, Delaware 19897

NR 433935-02

VOLUME 5

CAPTAN: A CTL RE-EXAMINATION OF DUODENAL SECTIONS FROM A LIFETIME ORAL ONCOGENICITY STUDY IN MICE (BIO/DYNAMICS PROJECT NO: 80-2491)

Author

M Robinson

Data Requirement - Guideline Ref. 83.2

Study Completion Date - 28 SEP 1984

Performing Laboratory - Zeneca Central Toxicology Laboratory
Alderley Park, Macclesfield,
Cheshire, UK

Laboratory Project ID - Report No : CTL/T/2829
Bio/Dynamics Project No: 80-2491

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CAPTAN: A CTL RE-EXAMINATION OF DUODENAL SECTIONS FROM A LIFETIME ORAL ONCOGENICITY STUDY IN MICE (BIO/DYNAMICS PROJECT NO: 80-2491)

EPA FLAGGING CRITERIA

I have applied the criteria of 40 CFR 158.34 for flagging studies for potential adverse effects to the results of the attached study. This study meets or exceeds the criteria numbered 1 and 3.

There was an increased incidence of benign duodenal neoplasa in females fed 800 or 6000ppm captan and possibly in males fed 6000ppm captan. The incidence of duodenal adenocarcinoma was increased in both males and females fed 6000ppm.

This work constitutes a re-evaluation of an existing study of which the EPA are already aware.

Submitter: Zeneca Inc