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

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AUG 28 1987

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 87-CA-31, Section 18 Emergency Exemption. Mancozeb  
on Dates. No Accession or MRID #. RCB # 2681.

FROM: Leung Cheng, Chemist *L. Cheng*  
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Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Edward Zager, Section Head  
Residue Chemistry Branch  
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TO: D. Stubbs/L. Pemberton, PM #41  
Emergency Response Branch  
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*Susan V. Hummel, for*

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

The California Department of Food and Agriculture has requested a Section 18 emergency exemption for the use of Dithiane 45 S Dust on dates to control Alternaria fungus. The request is identical to the one made in 1986 (except restricted to Riverside and Imperial counties in the current request). (See 86-CA-27, F. Suhre's memo of 7/23/86).

Dithiane 45 Dust contains 8% mancozeb [coordination product of zinc ion and manganese ethylene bisdithiocarbamate (maneb)] and 50% sulphur as active ingredients.

Tolerances for residues of mancozeb calculated as zinc ethylene bisdithiocarbamate are established at 10 ppm on papayas, and 7 ppm on apples, cranberries, and grapes [40CFR180.176]. No tolerance is established on dates.

Tolerance for sulphur is not required since sulphur is generally recognized as safe [40CFR180.2].

The label would allow 1 to 3 ground applications (ground duster) of 2.4 lbs ai/A per season with a 15 day interval between treatments. A preharvest interval (PHI) of 28 days is imposed. The proposed label is identical to the one submitted in 1986

No residue data were submitted with this Section 18 request.

RCB previously concluded residues would not exceed 10 ppm ethylene bisdithiocarbamate (EBDC) and 0.02 ppm ethylenethiourea (ETU) in or on dates, and 20 ppm EBDC on processed dates as a result of the Section 18 use based on grape and raisin residue data (RCB memo of 7/23/86, F. Suhre, 86-CA-27).

RCB reiterates these residue levels in the absence of mancozeb residue data on dates.

Since dates are not a livestock feed item, we expect no transfer of secondary residues to animals.

#### CONCLUSIONS AND RECOMMENDATION

We repeat the conclusions as stated in RCB's 7/23/86 memo:

1. The residues of concern are mancozeb and its metabolite ETU.
2. Analytical methods for determining residues of mancozeb (PAM II, Method III) and ETU (AOAC 14th edition, Method 29.119) are available.
3. Residues on fresh and processed dates are not expected to exceed 10 and 20 ppm EBDC respectively and 0.02 ppm ETU as a result of this Section 18 use.
4. A reference standard is available for mancozeb from the EPA Pesticide and Industrial Chemical Repository in RTP, NC. No reference standard is available for ETU.

TOX consideration permitting, we have no objections to the issuance of this Section 18 request. An agreement should be made with FDA regarding the legal status of the treated dates in commerce.

cc:Circu, RF, SF, Cheng, §18 F, PMSD/ISB, Mancozeb S.F.  
RDI:SVHummel:8/28/87:RDSchmitt:8/28/87  
TS-769:RCB:RM810:CM#2:Cheng:8/28/87:10