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CONFIDENTIAL



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

AUG 25 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCESMEMORANDUM

SUBJECT: Response to the Mancozeb Registration Standard,
Pennwalt Corporation

ID NO(S). 4581-358
RCB NO(S). 4270
MRID NO(S). 407659-00, 01

FROM: H. Fonouni, Ph.D., Chemist *H. E. Fonouni*
Dietary Exposure Branch
Health Effects Division (TS-769C)

TO: Lois Rossi (PM-21)
Herbicide/Fungicide Branch
Registration Division (TS-767C)

THRU: William J. Boodee, Section Head *WJB*
Dietary Exposure Branch
Health Effects Division (TS-769C)

In response to the Mancozeb Registration Standard (Guidance Document, April 1987 and Task 1, September 10, 1986), and our memorandum dated June 3, 1988, Pennwalt Corporation has forwarded product chemistry information/data on an unregistered technical chemical. The information/data submitted and our conclusions are discussed below.

62-2 Certification of Ingredient Limits

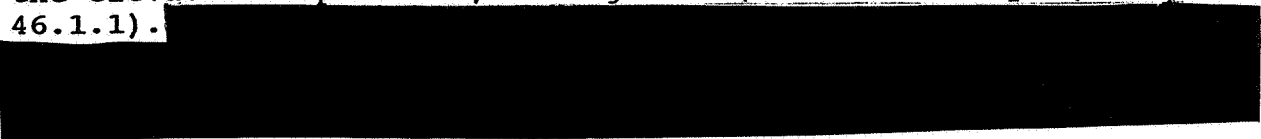
The information/data provided with the letter of July 6, 1988 appear in Confidential Appendix A.

The information/data provided do not satisfy the requirements for this topic. Certified limits must be established for the unregistered technical using method(s) which would distinguish mancozeb per se from other potential carbon disulfide producing contaminants. In addition, certified limits must be established for all impurities expected to be present at a level $\geq 0.1\%$ (w/w) of the product; refer to Confidential Appendix A.

63 Physical and Chemical Characteristics

MRID No. 40765901

The registrant has provided data on stability of the technical product (63-13) indicating 4% loss of the active ingredient at the elevated temperature, 54 degrees C, within 14 days (MT 46.1.1).



Comment(s):

The composition of mancozeb in the product should be determined using method(s) which would distinguish mancozeb per se from other potential carbon disulfide producing impurities/degradation products.

The information/data provided do not satisfy the requirements for this topic. Information/data should be provided on stability (63-13) of the unregistered technical chemical towards heat (ambient and elevated temperature), sun light, metals and metal ions.

cc: Mancozeb Registration Standard File, SF, Reviewer
(H. Fonouni), RBP, TOX (R. Coberly), PMSD/ISB (E. Eldredge),
PM 21 (L. Rossi)

Attachment I - Confidential Appendix A (2 pages)

cc: Mancozeb Registration Standard File, SF, Reviewer, RBP, TOX
(R. Coberly), PMSD/ISB (E. Eldredge), PM 21 (L. Rossi)

cc: Mancozeb Registration Standard File, SF, RF, Reviewer, RBP,
TOX (R. Coberly), PMSD/ISB (E. Eldredge), PM 21 (L. Rossi),
Circu.

Mancozeb residue chemistry review

Page _____ is not included in this copy.

Pages 3 through 4 are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients
 - Identity of product impurities
 - Description of the product manufacturing process
 - Description of product quality control procedures
 - Identity of the source of product ingredients
 - Sales or other commercial/financial information
 - A draft product label
 - The product confidential statement of formula
 - Information about a pending registration action
 - FIFRA registration data
 - The document is a duplicate of page(s) _____
 - The document is not responsive to the request
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
