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PMSD/ISB



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

OCT 3 1988

Memorandum

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Subject: Mancozeb; Product chemistry analytical method;  
Request for waiver, No MRID No.; DEB No. 4306,  
and 4307.

From: Francis B. Suhre, Chemist *Francis B. Suhre*  
Special Registration Section II  
Dietary Exposure Branch  
Health Effects Division (TS-769)

Thru: Edward Zager, Section Head *E. Zager*  
Special Registration Section II  
Dietary Exposure Branch  
Health Effects Division (TS-769)

To: Lois Rossi, PM-21  
Fungicide-Herbicide Branch  
Registration Division (TS-767)

E. I. Du Pont De Nemours and Co. has requested a waiver from the requirement of developing an analytical method capable of distinguishing mancozeb (active ingredient) from other carbon disulfide producing contaminants in Mancozeb TGAI. The registrant contends that it is not technically feasible to develop such an assay.

Note to PM: In several recent mancozeb reviews (H. Fonouni, memos dated 6-10-88, 7-1-88, 8-25-88, and S. Hummel memo dated 4-21-88), DEB recommended that analytical method(s), suitable of distinguishing mancozeb from other potential carbon disulfide producing contaminants, be provided.

Conclusion/recommendation

The ability to distinguish mancozeb from other carbon disulfide producing contaminants is essential to the establishment of Certified Limits for Mancozeb TGAI. A confirmatory method which specifically measures mancozeb in the presence of other CS<sub>2</sub> generating compounds is needed.

We recommend against this waiver request.

cc:R.F.,S.F.,Reviewer,ircu,macozeb Reg. Std. File,PMSD/ISB  
RDI:EZ:10/3/88:RDS:10/3/88  
TS-769:DEB:FBS:fbs:557-1883:CM#2:RM814:10/3/88