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

*PMIS-TISB*

DEC 16 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Mancozeb - Unregistered Technical - Rohm & Haas Company - Product Chemistry Data Dated November 18, 1988 (MRID Nos. 408983-01 and 408983-02) - DEB No. 4689

FROM: Gobind P. Makhiyani, Chemist *G.P. Makhiyani*  
Dietary Exposure Branch  
Health Effects Division (TS-769C)

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

and

Reto Engler, Ph.D., Chief  
Science Analysis and Coordination Branch  
Health Effects Division (TS-769C)

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

In response to a Dietary Exposure Branch memorandum (G.P. Makhiyani) dated November 9, 1988, Rohm & Haas Company has submitted additional product chemistry data (MRID No. 408983-01 and 408983-02, dated November 18, 1988) for the unregistered mancozeb technical.

These data and our conclusions are discussed below.

61-2 - Description of the Manufacturing Process

The registrant has submitted (MRID No. 408983-01) a correction for the percent composition of the unregistered technical material.

This fulfills the requirements of this topic and no further information is needed.

63-8 - Solubility

The registrant has submitted a study (MRID No. 408983-02) for determination of solubility of Dithane M-45 in 10 organic solvents and DMSO by UV analysis. These data show that solubility of Dithane M-45 is negligible or nonexistent in the series of solvents examined by the registrant. In the case of DMSO, the intensity of absorption peak varied with time and its frequency changed by modifying the solvent composition with water.

This fulfills the requirements of this topic and no further information is needed.

63-2 - Preliminary Analysis

The only remaining product chemistry data gap involves this topic.

A compositional analysis must be provided for the unregistered technical, including its impurities, using methods which would distinguish mancozeb from other potential carbon disulfide-producing contaminants.

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