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

AUG 29 1985

EXPEDITE

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Identifying Number 14505. Necessity for octanol-water coefficient data for maneb. Accession Number 259074. [RCB# 1392]

FROM: Richard Loranger, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

R. Loranger

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Susan Lewis, PM Team 50, Data Call In Office
Registration Division (TS-767)

We have been requested to determine whether data are required for the octanol-water partition coefficient of maneb. This review is being expedited at the request of Douglas D. Campt, Director, Registration Division (8/26/85).

The octanol-water partition coefficient is one of the parameters requested in a data call in notice. In response the Maneb Data Task Force has stated that such information is not required for maneb based on its chemical properties. They note that 40 CFR 158.120 requires the partition coefficient to be determined if the chemical is organic and non-polar. Since maneb is a coordination type product bound with manganese ions, it has inorganic/polar properties. They also note that maneb is practically insoluble in both water and octanol as well as not being stable in that solvent mixture. Therefore, determining the coefficient would be a "wasteful exercise" and is unlikely to yield any meaningful data.

We do not concur that partition coefficient data should not be required for maneb. Although it is not entirely organic, it is an organometallic type compound. Also, The Merck Index (Tenth Edition) states that maneb is soluble in chloroform and pyridine. Therefore, it is possible that the compound could preferentially partition into octanol versus water. Thus, some data should be provided for maneb concerning this parameter.

In searching our files we have found that indeed such data have already been generated by Rohm and Haas. In Accession Number 257953 (Product Chemistry Information, Dithane M-45, received 4/30/85) is a study entitled "The Octanol/Water Partition Coefficients of Dithane M-45, Dithane M-22, Dithane Z-78, and Ethylenethiourea" (L.D. Haines, 10/19/82). Thus, Rohm and Haas has determined the octanol-water partition coefficients for mancozeb, maneb, and zineb. This study appears satisfactory, but was submitted as Confidential Property of Rohm and Haas. Therefore, we defer to Registration Division as to whether the data are available for the entire Task Force.

CONCLUSION AND RECOMMENDATION

Data should be generated for the octanol-water partition coefficient of maneb. Such information has already been submitted by Rohm and Haas under Accession Number 257953. We defer to Registration Division as to whether these data may be made available to the entire Maneb Data Task Force.

cc: Circu, RF, EBDC SF, Maneb SF, PM-21 (H. Jacoby),
A. Rispin (SIS), F. Sanders (SRB, RD), Reviewer, PMSD/ISB
RDI:Section Head:ARRathman:8/29/85:RDSchmitt:8/29/85
TS-769:RCB:R.Loranger:557-7324:RAL:CM#2:RM.810:Date:8/29/85