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

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DEC 5 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

EXPEDITE

SUBJECT: Special Review Action Code 870 - Maneb Data Call-In [RCB No. 210]. Evaluation of Product Chemistry Data for Maneb Produced by Pennwalt Corporation (No Accession Number).

FROM: Michael P. Firestone, Ph.D., Chemist
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Michael P. Firestone

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
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[Signature]

TO: Susan Lewis
Data Call-In Program
Registration Division (TS-767C)

and

Henry M. Jacoby, PM #21
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Note: This EBDC data package has been submitted in connection with the NRDC lawsuit. All EBDC reviews are being expedited for the request of Mr. Douglas D. Campt, Registration Division Director (see D. Campt memo of June 26, 1985, to J. Melone - HED Director).

Background

RCB has recently reviewed a product chemistry data package submitted by Pennwalt Corporation for its products Maneb Technical (EPA Reg. No. 4581-355) and Maneb 80 Fungicide (EPA Reg. No. 4581-255) (see M. Firestone memo of November 20, 1985).

The data package was found to be incomplete for a wide variety of reasons, especially including the need to submit separate data as required by 40 CFR 158 for each maneb manufacturing-use product (MUP), end-use product (EUP) produced by an integrated formulation system, and technical chemical (whether registered or not).

Present Considerations

RD has forwarded an old Registration Data Sheet received by USDA on March 17, 1967 for Maneb 80 (Reg. No. 4581-255).

RCB's Comments/Conclusions

The present information is considered out of date since the manufacturer had submitted a CSF dated August 29, 1985 for both Maneb 80 Fungicide (EPA Reg. No. 4581-255) and Maneb Technical (EPA Reg. No. 4581-355).

RCB continues to recommend that the registrant submit all data/information requested in RCB's November 20, 1985 memo including CSF's (EPA Form 8570-4; Revised February, 1985) for each MUP and EUP produced by an integrated formulation system. The registrant should consult the Product Chemistry Guidelines - Subdivision D of 40 CFR 158 for help in preparing a detailed and complete data package.

cc:Circu, Reviewer (MPFirestone), EDBC S.F., R.F., PMSD/ISB,
TOX, SLewis, PM#21
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