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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

EXPEDITE

MEMORANDUM

SUBJECT: Special Review Action Code 870 - Maneb Data Call-In [RCB No. 211]. Evaluation of Product Chemistry Data for Maneb Produced by BASF Wyandotte (No Accession Number).

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

Michael P. Firestone

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

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

and

Henry Jacoby, Product Manager No. 21
Registration Division (TS-769)

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 per the request of Mr. Douglas D. Campt, Registration Division Director (see D. Campt memo of June 28, 1985 to J. Melone, HED Director).

Background

RCB has recently reviewed a product chemistry data package submitted by BASF Wyandotte Corporation for only its product Maneb Technical Grade (EPA Reg. No. 7969-11) (see M. Firestone memo of November 19, 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 under 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 a Confidential Statement of Formula (CSF) for Basofix BM 117 (Reg. No. 7969-3) dated March 1, 1982 and a Statement of Ingredients for BASF Maneb Plus (Reg. No. ?) dated May 18, 1967.

RCB's Comments/Conclusions

The old CSF's are not considered acceptable in RCB's evaluation of the product chemistry for maneb produced by BASF Wyandotte.

RCB continues to recommend that the registrant submit the data/information requested in RCB's November 19, 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), EBDC S.F., R.F., PMSD/ISB,
TOX, SLewis, PM#21 (H. Jacoby)
RDI:JHOnley:11/26/85:RDSchmitt:11/26/85
TS-769:MPFirestone:CM#2:RM800b:wh:TS-769:557-7484

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