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

PMSD/TSB  
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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

**EXPEDITE**

SUBJECT Special Review Action Code 870 - Maneb Data Call-In [RCB No. 248]. Evaluation of Product Chemistry Data for Maneb Produced by Rohm and Haas Company (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)

*[Handwritten 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-769C)

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 26, 1985, to J. Melone, HED Director).

## Background

RCB has recently reviewed a product chemistry data package submitted by Rohm and Haas Company in support of its following maneb containing products:

Dithane M-22 Agricultural Fungicide  
EPA Registration No. 707-48;  
Dithane M-22 Special  
EPA Registration No. 707-83;  
Dithane M-22 Special with Zinc Concentrate  
EPA Registration No. 707-101;  
Dithane M-22 Concentrate  
EPA Registration No. 707-103;  
Dithane S-31 Agricultural Fungicide  
EPA Registration No. 707-124;  
Dithane FZ Flowable Agricultural Fungicide with Zinc  
EPA Registration No. 707-170; and  
Dithane M-22  
Intrastate EPA Registration No. 707-10176

(see M. P. Firestone memo of November 20, 1985).

The original data package was found to be incomplete for a variety of reasons including the need to submit a separate Confidential Statement of Formula (EPA Form 8570-4; Revised February, 1985) and/or set of data for each manufacturing use product (MUP), end use product (EUP) produced by an integrated formulation system, and technical chemical (whether registered or not) as required by 40 CFR 158.

RD has previously forwarded old CSF's for Dithane M-22 Concentrate (EPA Reg. No. 707-103) dated May 20, 1981 and Dithane Flowable Plus Zinc (EPA Reg. No. 707-RTN) dated January 20, 1982 along with information sheets concerning inert ingredients in Dithane S-31 (EPA Reg. No. 707-77) received September 12, 1974 by EPA and Dithane M-22 Special with Zinc Concentrate (EPA Reg. No. ?) - date received unknown. This information was considered by RCB to be out of date (see M. Firestone memo of 12/9/85).

## Present Considerations

RD has now forwarded a CSF dated March 19, 1981 for Dithane M-22 (EPA Reg. No. 707-48) and letters of May 7, 1964 to USDA (Registration Section) and May 18, 1964 to the Florida Department of Agriculture re: Dithane M-22 Special.

RCB's Comments/Conclusions

The above information is considered out of date. As stated previously, a CSF (EPA Form 8570-4; Revised February, 1985) will be required for each registered technical, MUP, and EUP produced by an integrated formulation system. Separate Series 63 data (physical and chemical properties) for each of the above registered products and the technical chemical regardless of whether it is registered will also be required. The registrant should consult the Product Chemistry Guidelines - Subdivision D of 40 CFR 158 for help in preparing an adequately detailed and complete data package.

cc:Circu, Reviewer (MPFirestone), EBDC S.F., R.F., PMSD/ISB,  
TOX, SLewis, PM#21 (H. Jacoby)  
RDI:JHOnley:12/9/85:RDSchmitt:12/9/85  
TS-769:MPFirestone:CM#2:RM800b:wh:TS-769:557-7484