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

DEC 12 1985

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

**EXPEDITE**

MEMORANDUM

**SUBJECT** Special Review Action Code 870 - Maneb Data Call-In  
[RCB Nos. 249 and 250]. Evaluation of Product  
Chemistry Data for Maneb Produced by BASF Wyandotte  
(No Accession Number).

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

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

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

and

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

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 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).

RD has previously 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. This information was considered by RCB to be out of date (see M. Firestone memo of 12/9/85).

#### Present Considerations

RD has forwarded two sets of information regarding maneb products registered by BASF Wyandotte Corporation.

The first set consists of a Confidential Ingredients Statement for BASF Maneb Technical Grade (USDA Reg. No. 7969-RR) dated November 30, 1970 and a newer CSF dated July 31, 1984 for Maneb Technical Grade (EPA Reg. No. 7969-11) (note: RCB previously concluded that a CSF dated September 10, 1985 for EPA Reg. No. 7969-11 was inadequate [redacted] intentionally added inerts are not listed on the CSF - M. Firestone memo of November 19, 1985).

The second set consists of an Application for Registration of Economic Poisons for Polyram-M (Maneb) (Reg. No. ?) dated December 20, 1966 and letters dated December 19, 1969 and May 21, 1970 re: BASF Maneb 80WP (USDA Reg. No. 7969-4).

#### 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)  
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