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WASHINGTON, D.C. 20460

PMSD/ISB

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JAN 9 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Special Review for Maneb
EBDC Data Call In. Addendum to our review of the Task Force
submission of product chemistry data dated 8/29/85.
Accession Nos. 259074, 259124
[RCB Nos. 773, 1418, 1421, 1422]

From: Martha J. Bradley, Chemist *MJ Bradley*
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Thru: Charles L. Trichilo, Chief
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To: H. Jacoby, PM 21
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When we reviewed the Maneb Task Force proposals to satisfy the Data Call-In requirements, (memo of M. Bradley 4/16/85) we made no comment on the use of a "generic" manebe technical product for generating physical and chemical property data to represent all manebe technical products. This no comment was interpreted as acceptance of the proposal.

In our review of September 11, 1985, we stated in Conclusion 2 that certain of the physical and chemical characteristics submitted for the "generic" product were acceptable for technical manebe. More recent reviews of manebe product chemistry data have required the physical and chemical characteristic data for each chemical because differences in purity, manufacturing process, etc. could cause differences in the physical and chemical characteristics. This difference occurred because one reviewer assumed that all technical manebes would be the same while the other reviewer did not assume they would be the same in the absence of data.

We now recommend that the registrants be told that if there are significant differences in the chemical composition of the numerous technical manebes, the physical and chemical characteristics for individual technical chemicals

may be required. Product Chemistry data, Series 61 and 62 must be submitted for each technical chemical accompanied by an updated confidential statement of formula (EPA Form 8570-4 Rev 2-85).

The acceptance of "generic" data only applies to technical maneb. Product chemistry data, including physical and chemical characteristics, of each manufacturing use product containing intentionally added inerts are required by the Data Call In Notice of October 1984.

cc: Reviewer, EBDC SF, R F, circu, TOX, Amy Rispin, PMSD/ISB, M. Firestone
RDI:Section Head:RSQuick:Date:01/08/86:RDS:01/09/86
TS-769:RCB:Reviewer:MJBradley:MJB:CM#2:RM:810:557-1521:1/07/86