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

JAN 23 1986

MEMORANDUM

OFFICE OF
REGISTRATION AND TOXIC SUBSTANCES

Subject: Special Review Action Code 870
Maneb Data Call-In. Request for time extension for crop residue
data. Questions from OGC, 01/16/86
Accession No. NONE [RCB No. 408]

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RCB has been requested by Special Review Branch, RD to answer several questions posed by Phil Ross of OGC concerning maneb crop residue trials.

Background

The Maneb Task Force submitted proposals, dated March 1, 1985, to satisfy crop residue requirements for maneb and ETU. The Task Force chose 12 crops which comprise 70-75% of the market and referred to them as representative crops. The Task Force did not say what the crops were representative of. In our review of the proposals (M. Bradley, April 16, 1985), we accepted the Task Force proposals for the 12 specific crops and inquired whether the remaining crops were to be dropped from the maneb labels. A report from the Task Force dated June 7, 1985 stated that they recognized the need for residue data for all crops having tolerances and that when the Agency had commented on the proposed program for the 12 selected crops, the Task Force would consider expanding the program into a second year.

A later letter, dated December 27, 1985 from Joseph D. Panetta on behalf of the Maneb Task Force, requested extension of the deadline for crop residue data another year to conduct residue trials for the remaining crops.

The OGC questions along with our replies follows:

1.
Did EPA's apparent delay in responding to the Task Force's March 1, 1985, letter until July 17, 1985, contribute in any way to the failure of the Task Force to meet the deadline for the 28 crops?

RCB: Since the letter was received on March 1, and crop trials would have to be carried out on crops planted in April, it is unlikely that the Agency could have replied fast enough to allow the Task Force to plan, schedule and initiate the necessary field trials for the additional 28 crops in the 1985 growing season.

2.
Could the Task Force have begun the testing on those crops if it had heard within a month of its request? Or had it already missed the growing season?

RCB: Disregarding seed treatment, tobacco and pineapple stock treatment, most of the remaining crops are planted or are to be treated at bloom in early April. Unless the studies had been planned and contracted for, a reply from the Agency by the first of April would have been too late for the 1985 growing season. Even for crops for which late season planting is practiced, data on early season plantings would also be requested for a complete residue chemistry data base.

Possible exceptions are: cranberries which are treated after midbloom about July; Kadota figs which are treated 10 to 20 days before harvest in August to early November; papaya which is treated when fruit is set, papaya bloom continuously and are harvested in midwinter to June in Florida and rhubarb grown in greenhouses in MI if proper temperature and light could be provided.

3.
What was the latest the Task Force could have begun the testing in 1985/1986 and still met a deadline of May 1986 for all 40 crops?

RCB: Most of the crops should have been planted or treated in April, 1985.

4.
What did the Task Force say in response to the July 17th letter which basically said test or drop the uses?

RCB: The maneb Task Force responded to the Agency July 17, 1985 letter in a letter dated August 15, 1985. This letter was not sent to RCB for comment. On learning that there was such a letter, we requested a copy from Special Review Branch, RD and received a copy January 21, 1986.

The August letter states for the first time that the Task Force never intended dropping any crops from their maneb labels; that the deadline given in the Data Call In Notice was too short to support all of the crops;

that their plan was to support 12 crops, about 70-75% of the market and would support the remaining crops in 1986 and continue further if necessary. The maneb Task Force argues that the remaining 26-28 crops represent less than 30% of the total maneb usage and that a number of these crops would probably fall within the minor use policy, 40 CFR 158.60, and would require a different data program. The maneb Task Force further argues that the use of maneb on these minor crops presents no unreasonable adverse effects on the environment and therefore there is no basis for removing these uses from the labels.

We concur with the maneb Task Force in that a few of the remaining crops could be considered minor crops, however most of the remaining crops are major crops. A certain amount of data are needed even for minor crops. In our memo (M. Bradley, 1/17/86) we have listed all of the crop uses of maneb by crop group where one exists. This crop group scheme, 40 CFR 180.34 (f) was originally developed to minimize the burden of establishing tolerances for pesticide residues in or on minor crops (48 FR 29855, June 29, 1983).

The memo listing all maneb crop uses (1/17/86) includes present use patterns, principle growing areas, components for which residue data are needed and, where applicable, the required crops representative of their crop group for which residue data are needed. We have noted that the use directions for several crops, mainly leafy vegetables including brassica vegetables, direct that residues or excess residues should be removed by trimming, stripping and washing. These conditions were previously accepted by the Agency to reduce the dietary burden of EBDC and unknown amounts of ETU. However, we feel that these trimming and washing directions are not practical and should not be continued in lieu of residue data for ETU. One possible exception, previously accepted by the Agency, is the washing of spinach grown expressly for processing companies, however, this should be considered very carefully as over tolerance residues of EBDC and residues of ETU have been found in the past. There are also a number of livestock feeding restrictions that are not practical and should not be continued in lieu of residue data for ETU and if needed, tolerances for meat, milk, poultry and eggs.

5.

Did the Agency promptly respond to the August letter?

RCB: RCB did not receive this letter until 1/21/86, thus any response to this letter would have come from RD.

6.

What happened between July 17th and December 27th within the Agency and between the Agency and the Task Force regarding the crop residue issue?

RCB: RCB had no input regarding crop residue trials during this time period.

7.

Did the Agency meet with the Task Force as requested in the December 27, 1985, letter?

RCB: RCB did not meet with the Task Force in December, 1985.

Conclusions/Recommendations

In regard to the maneb Task Force letter of August 15, 1985 stating that they have no intention, at this time, to drop any of the crops listed on their labels, we feel that for a number of crops, the use directions for livestock feeding restrictions and removing excess residues are not practical and should not be continued in lieu of residue data for ETU and, if needed, tolerances for meat, milk, poultry and eggs.

cc: Reviewer, EBDC SF, R F, circu, F.Sanders(RD), Amy Rispin, PMSD/ISB
RDI: Section Head:RSQuick: Date: 01/23/86: RDS: 01/23/86
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