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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Special Review Action Code 870 - Maneb Data Screen  
for Nectarines, Apricots, Turnip Tops, Turnip Roots,  
Figs, Peaches, and Cranberries - MRID Nos. 401099-00  
thru 401099-07 [RCB No. 2124]

FROM: Martin F. Kovacs, Jr., Ph.D., Chemist  
Tolerance Petition Section II  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

TO: Joan Warshawsky  
Special Review Branch  
Registration Division (TS-767C)

and

Henry F. Jacoby  
Science Integration Staff  
Hazard Evaluation Division (TS-769C)

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

RCB has been asked by the DCI staff to screen/review  
this EBDC data package for use in maneb reassessment per  
NRDC/Data Call-In and also for use in evaluating the return  
of the subject use patterns to maneb labels.

RCB has screened the maneb and ethylene thiourea (ETU)  
residue data contained in Volumes 2 to 8, listed in the  
attached sheets.

Nectarines (Vol. 2, MRID No. 401099-01)

Included in this submission were:

1. Resubmitted residue data for maneb and ETU from one California field trial (Terra Bella, Orius Study No. 12786 dated January 31, 1987).
2. New residue data for maneb and ETU from five additional California field trials; Orius Studies Nos. 11086, 11886, 12886, 12986, and 13086, all dated March 1, 1987.

Apricots (Vol. 3, MRID No. 401099-02)

Included in this submission were:

1. Resubmitted residue data for maneb and ETU from one California field trial (Terra Bella, Orius Study No. 12286 dated January 31, 1987).
2. New residue data for maneb and ETU from five additional California field trials; Orius Studies Nos. 10986, 12386, 12486, 12586, and 12686, all dated March 1, 1987.

Turnip Tops (Vol. 4, MRID No. 401099-03)

Included in this submission were:

1. Reanalyzed and resubmitted residue data for maneb only from one Georgia field trial (Hawkinsville, Orius Study No. 15186 dated March 1, 1987).
2. New residue data for maneb and ETU from two California field trials, one additional Georgia field trial, one New Jersey field trial, and one Texas field trial; Orius Studies Nos. 10286, 11586, 13886, 15286, and 16786, all dated March 1, 1987.

Turnip Roots (Vol. 5, MRID No. 401099-04)

Included in this submission were:

1. Additional residue data for maneb and ETU from two California field trials (Hickman and King City, Orius Studies Nos. 10286 and 11586, dated March 1, 1987.)
2. New residue data for maneb and ETU from one Texas field trial, two Georgia field trials, and one New Jersey field trial; Orius Studies Nos. 13886, 15186, 15286, and 16786, all dated March 1, 1987.

Figs (Vol. 6, MRID No. 401099-05)

Included in this submission were:

1. Resubmitted residue data for maneb and ETU from one California field trial (Fresno, Orius Studies No. 13686 dated January 31, 1987).
2. New residue data for maneb and ETU from three additional California field trials; Orius Studies Nos. 13386, 13486, and 13586, all dated March 1, 1987.

Peaches (Vol. 7, MRID No. 401099-06)

Included in this submission were:

1. Resubmitted residue data for maneb and ETU from two Georgia field trials (Farmington and Bishop, Orius Studies Nos. 15486 and 15586 dated January 12, 1987).
2. New residue data for maneb and ETU from four California field trials; Orius Studies Nos. 13186, 13286, 11286, 11386, and 17086, all dated March 1, 1987.

Cranberries (Vol. 8, MRID No. 401099-07)

Included in this submission were:

- Maneb and ETU residue data from one New Jersey field trial (Orius Study No. 18586 dated March 1, 1987).

Comments1. Nectarines

Both resubmitted and new residue data for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 8 months. In addition, both maneb and ETU residue samples were held in a ground and frozen condition for up to 60 days before analysis.

2. Apricots

Both resubmitted and new residue data for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 8 months. In addition, both maneb and

ETU residue samples were held in a ground and frozen condition for up to 80 and 59 days respectively.

3. Turnip Tops

Reanalyzed, resubmitted residue data for maneb only and new residue data for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 3 1/2, 7 1/2, 8, and 8 months for the NJ, GA, TX, and CA field trials, respectively. In addition, the maneb and ETU residue samples obtained from the CA field trials were held in a ground and frozen condition for up to 14 days.

4. Turnip Roots

The additional maneb and ETU residue data from CA and the new maneb and ETU residue data from TX, GA, and NJ were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 8, 8, 7 1/2, and 3 1/2 months respectively. In addition, the maneb and ETU residue samples obtained from both CA field trials were held in a ground and frozen condition for up to 15 days before analysis. The maneb check samples from both the GA field trials were also contaminated, including both the maneb and ETU check samples from the NJ field trial.

5. Figs

Both resubmitted and new residue data for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 6 1/2 months. In addition, maneb and ETU residue samples were held in a ground and frozen condition for up to 11 and 20 days before analysis, respectively.

6. Peaches

Both resubmitted (GA) and new residue data (CA, NJ) for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 4 1/2, 8, and 7 months, respectively. In addition, the maneb and ETU residue samples obtained from the CA field trials were held in a ground and frozen condition for up to 7 and 46 days before analysis, respectively.

## 7. Cranberries

Residue data submitted for both maneb and ETU were not supported by frozen storage stability data although the sample harvest to analysis intervals ranged up to 4 months. In addition, maneb and ETU residue samples were held in a ground and frozen condition for 3 and 21 days before analysis, respectively.

### Conclusions

1. The currently resubmitted/reanalyzed including new residue studies (nectarines, apricots, turnip tops and roots, figs, and peaches) and new residue studies for cranberries are all deficient because none of the residue studies were supported by frozen storage stability data although residue samples obtained from these studies could have been held in frozen storage for approximately 4 to 8 months prior to analysis. In addition, a majority of the residue samples were stored in a ground frozen condition for varying intervals of time prior to analysis, a condition which may accelerate the decomposition of both maneb and ETU. Therefore, RCB concludes that the submitted residue data are not even adequate for dietary exposure assessment, and thus do not pass the screen. These studies must be repeated to comply with the NRDC reassessment and DCI requirements and thus the subject use patterns should not be returned to the maneb labels.
2. Although we have identified only the obvious deficiencies in this screen, additional data deficiencies for the currently submitted residue studies may be noted upon completion of a full RCB review.

Attachment: Sheet - MRID No. 401099-00

cc: (with Attachment) W. Boodee, E. Zager, Reviewer - M. Kovacs,  
A. Barton, S.F., R.F., Ellenberger - SRB/RD, PMSD/ISB  
RDI:J. Onley:4/17/87:R.D.Schmitt:4/17/87  
TS-769:RCB:M.Kovacs:CM#2:Rm.812:x769:Typist Kendrick:edited  
by:mt:4/24/87

Attachment To Special Review Act  
 Code 870 Maneb Data Summary for  
 Nectarines, Apricots, Turnip tops and roots,  
 Figs and Cranberries

1. Names and Addresses of Joint Submitters:

Maneb Data Task Force, Submitter No. 56099

Pennwalt Corporation\*  
 3 Parkway, Room 619  
 Philadelphia, Pa 19102

Griffin Corporation  
 Rocky Ford Rd.  
 Valdosta, GA 31603-1847

BASF Corporation  
 100 Cherry Hill Rd.  
 P.O. Box 181  
 Parsippany, NJ 07054

Rohm and Haas Company  
 Independence Mall West  
 Philadelphia, PA 19105

\*Pennwalt Corporation will act as agent for all submitters.

2. Regulatory Action in Support of Which This Package is Submitted:

Data submitted in response to the EPA Data Call-In Notice of April 30, 1985 for Maneb - Magnitude of the Residue. EPA Guideline No. 171-4.

3. Transmittal Date: March 2, 1987

4. List of Submitted Studies:

Vol. 1 Administrative Documents

Vol. 2 Magnitude of the Residue in Nectarines Treated by Ground Equipment in California, 1986. Written by Douglas G. Baugher, Orius Associates, 2329 Oak Drive, Ijamsville, Maryland 21754.

Vol. 3 Magnitude of the Residue in Apricots Treated by Ground Equipment in California, 1986. Written by Douglas G. Baugher, Orius Associates, 2329 Oak Drive, Ijamsville, Maryland 21754. ✓

Vol. 4 Magnitude of the Residue in Turnip Tops Treated by Ground Equipment in Georgia, 1986. Written by Douglas G. Baugher, Orius Associates, 2329 Oak Drive, Ijamsville, Maryland 21754. ✓

Vol 5 Magnitude of the Residue in Turnip Roots Treated by Ground Equipment in Georgia, 1986. Written by Douglas G. Baugher, Orius Associates, 2329 Oak Drive, Ijamsville, Maryland 21754. ✓

Vol 6 Magnitude of the Residue in Figs Treated by  
Ground Equipment in California, 1986. Written by Douglas G. ✓  
Baugher, Orius Associates, 2329 Oak Drive, Ijamsville,  
Maryland 21754.

Vol 7 Magnitude of the Residue in Peaches Treated by  
Ground Equipment in California, 1986. Written by Douglas G.  
Baugher, Orius Associates, 2329 Oak Drive, Ijamsville,  
Maryland 21754.

Vol 8 Magnitude of the Residue in Cranberries Treated ✓  
by Ground Equipment in New Jersey, 1986.

Company Official: Joseph D. Panetta  
Name

[Handwritten Signature]  
Signature

Company Name: Pennwalt Corporation for: Maneb Task Force

Company Contact: Joseph D. Panetta  
Name

215-587-7147  
Phone