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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Maneb (014505)
Pennwalt Semi-Annual Progress Report
Maneb Comprehensive Data Call In of 4/1/87
EPA Reg. Nos. 4581-217, 4581-255, 4581-272, 4581-355,
and 4581-359
[No MRID No., RCB No. 2859]

FROM: Susan V. Hummel, Chemist
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THRU: Edward Zager, Section Head
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TO: Geri Werdig, PM #50
Data Call In Staff
Registration Division (TS-767C)

NPC, Inc. has submitted a semi-annual progress report on behalf of Pennwalt Corp., as required by the Maneb Comprehensive Data Call In of 4/1/87. Note that a storage stability data call in was issued on 3/31/87. We will comment only on portions of the progress report pertaining to Residue Chemistry.

Registrant Response

Magnitude of the Residue-Crop Field trials: The registrant representative reports that all studies are on schedule. Crops grown in the 1987 season are bananas, beans (dry, lima, snap), broccoli, cabbage, corn, cucumbers, grapes, kale, lettuce, onions (green), peppers, potatoes, spinach, sugar beets, tomatoes, and watermelons. Crops to be grown in the 1988 season are almonds, onions (bulb), and peaches. The processed commodities of beans, potatoes, tomatoes, grapes, and sugar beets will be analyzed, as well. Apples will not be supported. (Griffin Corp. was the only maneb registrant with apples on the label. Griffin is no longer supporting maneb registrations. (S. Lewis, DCI, personal communication).)

RCB Comment

RCB previously commented on the registrant's 90 day response to the 4/1/87 DCI (W. Hazel, 8/7/87). All field trial studies should be submitted within 18 mo. of the date of the letter. We have no further comment.

Registrant Response

Storage Stability Data. The registrant representative reports that storage stability studies on apples, spinach, lettuce, and tomatoes are on schedule. All fractions will be analyzed as EPA requested.

RCB Comment

Storage stability studies for this DCI are expected by 11/1/88. Studies for the 3/31/87 DCI are due earlier.

Registrant Response

Plant Metabolism. The registrant representative reports that plant metabolism studies are not applicable, since the registrant requested a waiver based on extensive EBDC metabolism data now in agency files which documents incorporation into the carbon pool of plants and animals.

RCB Comment

We commented on the registrant request for waiver of plant metabolism studies in our review of the registrant 90 day response to the DCI (W. Hazel). We recommended denial of the registrant request for a waiver of plant metabolism studies. A copy of our review (W. Hazel, 11/8/87) should be sent to the registrant, along with copies of all reviews and the chapters (Residue and Product Chemistry) prepared for the Registration Standard, including addenda. Refer to W. Hazel's review for our comments regarding the requested waiver of plant metabolism data.

Registrant Response

Animal Metabolism. The registrant reports that the required goat and poultry metabolism studies are on schedule. They report that they are currently reviewing existing data, and trying to identify qualified organizations to conduct carbon pool analysis.

RCB Comment

We expect that the animal metabolism studies will be completed by 11/1/88.

Registrant Response

Residue Analytical Method. The registrant representative reports that the residue analytical method study is on schedule. The registrant has reviewed the PAM protocols and reports that maneb would not be expected to be recovered by any of the PAM Multiresidue Protocols because it is an insoluble polymer which rapidly degrades in water and in organic solvents. A waiver request will be submitted shortly. ETU will be tested in the PAM multiresidue protocols beginning in November or December, 1987.

RCB Comment

We await the submission of the waiver request before commenting on the registrant response. We expect the results for ETU in the PAM Multiresidue protocols to be submitted by 11/1/88.

RECOMMENDATION

We recommend that copies of all of our reviews on maneb be forwarded to the registrant, including the Registration Standard Chapter and addenda. We continue to recommend against a waiver of plant metabolism data requirements for maneb. We expect that all required studies will be submitted by 11/1/88.

cc: R.F., circu, S. Hummel, Maneb S.F., Maneb S.R.F. (Hummel),
Maneb R.S.F. (Hazel), V. Bael (SRB/RD), S. Lewis (PM#21),
PMSD/ISB

RDI:EZ:12/14/87:KHA:12/14/87

TS-769:RCB:RM810:CM#2:SVH:svh:12/15/87