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

MAY 16 1988

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Maneb (014505)
Pennwalt Letters of 3/24/88 and 3/30/88 in response to
E. Tinsworth letter of 2/25/88
[No MRID No., RCB No. 3667]

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

and

Valerie Bael, PM#77
Special Review Branch
Registration Division (TS-767C)

Pennwalt Corporation has submitted two letters in response to the Agency letter of 2/25/88, regarding the Maneb Comprehensive Data Call In Notice of 4/1/87.

In their letter of 3/24/88, Pennwalt makes the following statement:

The Agency has indicated that validation data for previously submitted residue data for carrots, celery, spinach, peppers, apricots, peaches, and almonds would be unlikely to be acceptable. Pennwalt will, therefore, adopt the following strategy. Apricots, carrots, and celery will not be supported and will be dropped from the label, as will bananas, chinese cabbage, rhubarb, and tobacco. We will submit revised labels directly to the Product Manager, Lois Rossi. Data on spinach and peppers were submitted in response to the March 1, 1988 (sic) Data Call-In for Storage

Stability and will be cited in the 18 month response to the Comprehensive Data Call-In.

The balance of Pennwalt's letter of 3/24/88 and Pennwalt's entire letter of 3/30/88 did not deal with Residue Chemistry issues and will not be discussed in this memo.

RCB Comment

RCB has no objection to the registrant not supporting all of the crops, provided that the unsupported crops are removed from all Maneb labels. The registrant apparently intended to say that data on spinach and peppers were submitted in their 3/1/88 response to the 3/31/87 Storage Stability Data Call In Notice.

In this submission, no mention was made of the other crops which are not being supported: kale, apples, cranberries, asparagus, figs, and papayas. The Agency letter of 2/25/88 required revised labels deleting these crops and rhubarb, chinese cabbage, and tobacco within 30 days. Revised labels have been received by the Agency (S. Lewis, personal communication, 5/11/88). The Maneb Technical label (EPA Reg. No. 4581-355) recently submitted states, "This product may be formulated only for use on the following: almonds, apples, grapes, beans, broccoli, cabbage, melons, sweet corn, eggplant, lettuce, endive, peppers, potatoes, pumpkins, spinach, squash (summer and winter), tomatoes, grasses, sugar beets, and ornamentals." The crops which Pennwalt does not intend to support have been deleted from the Pennwalt Maneb labels.

RCB is unaware of any label changes removing the crops which are not to be supported from any maneb labels other than Pennwalt's. These label changes are still needed on all maneb labels.

NOTE TO PM: We note that Maneb 80 (EPA Reg No. 4581-255) contains directions for use of dust formulations. Pennwalt stated in their response to the 4/1/87 DCI that they did not intend to support dust formulations (See Pennwalt letter of 7/6/87).

CONCLUSIONS and RECOMMENDATIONS

RCB has no objection to the registrant not supporting all of the crops, provided that the unsupported crops are removed from all Maneb labels. Label changes removing the unsupported crops are still needed for all maneb labels.

We recommend that the product manager inform Pennwalt that we have no objection to their proposal to not support all of the crops, provided that the unsupported crops are removed from all

maneb labels. We recommend that the Product Manager ensure that all unsupported crops are removed from all maneb labels.

We recommend that the PM ensure that the discrepancy between Pennwalt's letter of 7/6/87 and the Maneb 80 label regarding the use of dust formulations is resolved.

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:05/11/88:RDS:05/11/88

TS-769:RCB:RM810:CM#2:SVH:svh:05/13/88