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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

December 9, 1988

MEMORANDUM

SUBJECT: Maneb (014505) Chromatograms for Maneb and ETU;
[MRID Nos. 406673-01, DEB No. 4005]

FROM: Susan V. Hummel, Chemist
Special Registration Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: Edward Zager, Section Head
Special Registration Section II
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TO: Valerie Bael, PM#77
Special Review Branch
Registration Division (TS-767C)

Orius Associates on behalf of the Maneb Registration Group (Pennwalt Corporation) has submitted chromatograms to support residue data submitted in response to the Special Review (Storage Stability) Data Call In Notice of 3/31/87.

CONCLUSIONS

The submitted chromatograms from previously submitted 1987 residue studies are from in the same general time frame as the residue data submitted in March, 1988, and in October, 1988, and therefore will be sufficient as supporting raw data for these studies. However, these chromatograms will not be sufficient for future submissions. Raw data including chromatograms are needed for all residue studies.

Detailed Considerations

Chromatograms from either Morse Laboratories or McKenzie Laboratories were submitted for the following crops from 1987 Residue Field Trials.

Crop (Morse Labs)	Crop (McKenzie Labs)
Apples	Broccoli
Corn Ears and Forage	Cabbage
Grapes and Processed Products	Cucumbers
Green Beans and Processed Prod.	Dry Beans and Straw
Lettuce	Green Onions
Potatoes	Peppers
Spinach	Succulent Beans and Hay
Sugar Beets and Processed Prod.	Watermelons
Sugar Beet Tops	
Tomatoes and Processed Products	

The submitted chromatograms included chromatograms for standards, control samples, samples fortified at the claimed limit of detection, some recovery samples, and treated samples.

DEB Comments

Chromatograms from Morse Laboratories. The dates of analysis and column conditions were given on the chromatogram for each crop. In general, we noted that the actual limit of detection may be less than the stated 0.1 ppm for maneb and 0.01 ppm for ETU. We found the LOD to be approximately 0.01 - 0.02 for maneb and 0.001 - 0.002 ppm for ETU. No interferences were noted, except for the ETU analysis of tomato products.

Chromatograms from McKenzie Laboratories. Some chromatograms were dated, but the chromatographic conditions were not given on the chromatograms. We noted an unstable baseline in a number of the ETU chromatograms, but generally no interferences.

cc: R.F., circu, S. Hummel, Maneb S.F., Maneb S.R.F. (Hummel), Maneb R.S.F. (Boodee), S. Lewis (PM#21), PMSD/ISB
RDI:EZ:12/07/88:RAL:12/07/88
TS-769:RCB:RM810:CM#2:SVH:svh:12/09/88