PMSD 1580

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

JAN 17 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Mancozeb - Unregistered Technical - Rohm and Haas Company - Product Chemistry Data Dated December 2, 1988 (No MRID Number Assigned) DEB No. 4743

FROM: Gobind P. Makhijani, Chemist
Dietary Exposure Branch
Health Effects Division (TS-769C)

TO: Lois A. Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

and

Reto Engler, Ph.D., Chief
Science Analysis and Coordination Branch
Health Effects Division (TS-769C)

THRU: William J. Boodee,
Reregistration Section
Dietary Exposure Branch
Health Effects Division (TS-769C)

Rohm and Haas Company has submitted a response to a Dietary Exposure Branch memorandum (H. Fonouni) dated July 1, 1988 for unregistered mancozeb technical. The Branch has been asked to respond to the comment by the registrant that follows:

> Rohm and Haas does not believe it is appropriate to generate stability data on the Unregistered Technical [redacted]

INFORMATION WHICH MAY REVEAL A MANUFACTURING PROCESS IS NOT INCLUDED

[redacted] Therefore, storage stability data are not relevant.

Response

The Branch concurs with the registrant's comment. The stability data submitted recently by the registrant (no MRID Number assigned, dated August 30, 1988, DEB No. 4368) indicate that the unregistered technical is decomposed by water under acidic conditions. Based on this submission, table A attached to our memorandum dated November 9, 1988 was amended. No additional data are required in connection with this topic.

The only remaining product chemistry data gap is as follows:

- 63-2 - Preliminary Analysis--A compositional analysis must be provided for the unregistered technical as well as the manufacturing-use product, including its impurities, using method which would distinguish manacozeb from other potential carbon disulfide producing contaminants.

cc: Mancozeb Registration Standard File, S.F, R.F., Reviewer, Circ., RBP, TOX (Coberly), PMSD/ISB (E. Eldredge), L. Rossi (PM21)