



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

JAN 24 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Mancozeb - Unregistered Technical and Manufacturing
Use Products - E.I. DuPont de Nemours and Company,
Inc. - Product Chemistry Data Dated December 2,
1988 - (No MRID Number Assigned) - DEB No. 4750

FROM: Gobind P. Makhijani, Chemist *G. Makhijani*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

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

and

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

THRU: William J. Boodee, Section Head *WJB*
Reregistration Section
Dietary Exposure Branch (TS-769C)

In response to a Dietary Exposure Branch memorandum
(H. Fonouni) dated August 15, 1988, E.I. DuPont de Nemours
and Company, Inc. has submitted additional product chemistry
data dated December 2, 1988 (no MRID Number assigned) for the
unregistered Mancozeb and Manufacturing Use Products Nos.
352-341, 352-398, 352-449, and 352-343.

These data and our conclusions are described below.

62-1 - Preliminary Analysis of Product Samples

62-2 - Certification of Ingredient Limits

62-3 - Analytical Methods to Verify Certified Limits

[REDACTED]

The registrant estimates that the necessary data for the active ingredients as well as impurities can be generated by December, 1989.

Dietary Exposure Branch (DEB) has no objection to granting the required additional time. The Branch recognizes that granting of time extension is a Registration Division administrative decision.

A data gap still exists here.

Physical and Chemical Characteristics

63-8 - Solubility

63-11 - Octanol/Water Partiton Coefficient

The required data will be submitted by the registrant by January, 1989.

A data gap still exists here.

63-10 - Dissociation Constant

The registrant contends that Mancozeb does not dissociate in any measurable way. Since the product does not dissolve without decomposition, the registrant believes that the generation of erroneous dissociation constant would do more harm than good.

DEB concurs with the registrant on this topic.

cc: Mancozeb Registration Standard File, S.F., R.F., Reviewer, Circ., RBP, TOX (Coberly), PMSD/ISB (E. Eldredge), L. Rossi (PM 21).