



Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268-1054

June 6, 2008 via electronic mail: [phann@waterboards.ca.gov](mailto:phann@waterboards.ca.gov)

Mr. Paul Hann  
Environmental Scientist  
Central Valley Water Quality Control Board (CVWQCB)  
11020 Sun Center Drive  
Rancho Cordova, CA 95670-6114

RE: Dow AgroSciences Comments on the April 2008 Report titled "Relative-Risk Evaluation for Pesticides Used in the Central Valley Pesticide Basin Plan Amendment Project Area"

Dear Mr. Hann:

On behalf of Dow AgroSciences LLC, the primary registrant of mancozeb and oxyfluorfen, I submit the following comments on the April 2008 staff report entitled "Relative-Risk Evaluation for Pesticides Used in the Central Valley Pesticide Basin Plan Amendment Project Area."

The mancozeb Koc was given as 6000 L/kg. USEPA, in its most recent publicly available assessment<sup>1</sup> gave a range of 860-1642 L/kg. Therefore, the value of 6000 is too large.

The oxyfluorfen Koc was stated to be 100,000 L/kg. This is excessively high, since the USEPA used the median value of 6831 L/kg (range of 5585-32,381) for groundwater exposure calculations and the lowest value of 5585 L/kg for surface water modeling<sup>2</sup>. Also, an upper range of 1,000,000 µg/L for a toxicity value is difficult to accept, given the water solubility of 100 µg/L. This is either an error or relates to the concentration of a formulated product, not the active ingredient.

Sincerely,

A handwritten signature in cursive script that reads "Nicholas N. Poletika".

Nicholas N. Poletika, Ph.D.  
Science Leader  
Dow AgroSciences LLC

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<sup>1</sup> Risks of Mancozeb and Maneb Uses to the Federally Listed California Red Legged Frog (*Rana aurora draytonii*) Pesticide Effects Determination. Environmental Fate and Effects Division, Office of Pesticide Programs, Washington, D.C. 20460, October 18, 2007

<sup>2</sup> USEPA. 2002. Reregistration Eligibility Decision for Oxyfluorfen.