MEMORANDUM

DATE: February 12, 1982

SUBJECT: New Source of Naphthalene Acetic Acid (NAA) a "Me-too" registration under SOP 3068.2
(EPA Reg. No. 264-29, -141, -137, -142, -248 and -336)

FROM: William L. Burnam, Deputy Chief
Toxicology Branch, HED (TS-769)

TO: Robert Taylor, PM 25
Fungicide/Herbicide Branch, RD (TS-767)

Action Requested: Union Carbide has requested a new source of NAA, its sodium salt and its amide and ethyl ester. and according to the RCB memo of Feb. 3, 1982 by Richard Loranger, the old and new products are not identical.

Recommendation: Based on my comparison of the analysis of I find that any difference between them is incrementally negligible.