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

NOV 8 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 100-601 New confidential statement of formula
for technical metalaxyl.

FROM: William L. Anthony, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry Jacoby/D. Beavers, Product Manager
Fungicide-Herbicide Branch
Registration Division (TS-769)

William L. Anthony

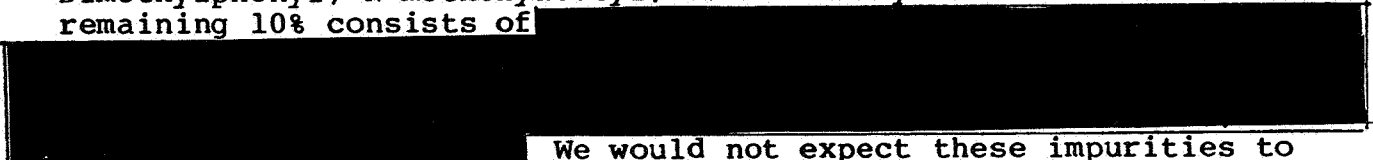
[Signature]

The Ciba-Geigy Corporation, Agricultural Division has submitted a revised CSF for their technical metalaxyl (EPA Reg. #100-601).

This submission is in response to RD's letter of August 16, 1982 (H. Jacoby to G. Holt) requesting clarification of Ciba-Geigy's revised formulation for technical metalaxyl. The letter was submitted to RD on June 29, 1982.

Ciba-Geigy contends that, except for "some re-arrangement", the enclosed Confidential Statement of Formula (CSF) is identical to the CSF submitted June 29, 1982.

Technical metalaxyl contains a minimum of 90% a.i., N-(2,6-Dimethylphenyl)-N-methoxyacetyl)alanine methyl ester. The remaining 10% consists of

 We would not expect these impurities to present a residue problem.

INERT INGREDIENT INFORMATION IS NOT INCLUDED

Conclusions

1. The revised confidential statement of formula adequately describes the composition of technical metalaxyl.

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2. We do not expect a residue problem from the impurities present in technical metalaxyl.

Recommendations

We recommend that the revised confidential statement of formula for technical metalaxyl be accepted.

cc: Metalaxyl S.F.
Ciruc
R.F.
Reviewer
Amended use file

RDI:Section Head:RJH>Date:11/8/82:RDS>Date:11/8/82
TS-769:RCB:Reviewer:WLANthony:LDT:X77377:CM#2:RM:810>Date:11/8/82

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