12-4-89

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

TXR

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No./File Symbol 2935-ULI
Wilbur-Ellis Apron TL

FROM: William S. Woodrow WSW 12-4-89
Precautionary Review Section
Registration Support Branch E 12/4/89
Registration Division (H7505C)

TO: Susan Lewis (PM 21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

APPLICANT: Wilbur-Ellis Co.
Suite # 107
191 W. Shaw Ave.
Fresno, CA 93704

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester	11.5
Inert Ingredient(s):	88.5
Total	100.0%

BACKGROUND:

A March 13, 1989 letter from EPA to the Wilbur-Ellis Co. stated that an Apron-TL (002935-ULI) acute inhalation toxicity study was graded Supplementary data; no particle size - size distribution measurements were presented. A Sept. 19, 1989 letter to EPA supplied the missing information.

RECOMMENDATIONS:

1) The particle size/size distribution information were provided in the Sept. 19, 1989 letter from Wilbur-Ellis Co., and are accepted by RSB/PRS. The MRID No. 405714-02 acute inhalation study is now hereby re-graded from Supplementary data to Core Guideline data.

2) The acute toxicity profile for Wilbur-Ellis APRon TL (2935-ULI) is now complete:

acute oral	Core minimum	Tox. Cat:	III
acute dermal	Guideline	"	III
acute inhalation	Guidelines	"	IV
Eye irritation	Guidelines	"	III
Skin irritation	Guidelines	"	IV
Skin sensitization	Guidelines	not a sensitizer	

LABELING:

1) The CAUTION signal word is appropriate.
2) The Precautionary Statements and Statements of Practical Treatment are acceptable.

Metalaxyl Sha # 113501

Page 4 is not included in this copy.

Pages _____ through _____ are not included.

The material not included contains the following type of information:

____ Identity of product inert ingredients.

____ Identity of product impurities.

____ Description of the product manufacturing process.

____ Description of quality control procedures.

____ Identity of the source of product ingredients.

____ Sales or other commercial/financial information.

✓ A draft product label.

____ The product confidential statement of formula.

____ Information about a pending registration action.

____ FIFRA registration data.

____ The document is a duplicate of page(s) _____.

____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
