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

FEB 27 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Metalaxyl Technical (EPA Reg. No. 100-601): New CSF and Label.

Project No.: 1-0708
Tox. Chem. No.: 375AA
Chem Code: 113501
Submission No.: S389259
MRID No.: N.A.
DP BAR CODE: D161407

TO: Susan Lewis/Benjamin Chambliss, PM Team # 21
Registration Division (H7505C)

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THRU: Roger L. Gardner, Section Head
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Health Effects Division (H7509C) *Roger L. Gardner 2/20/92*

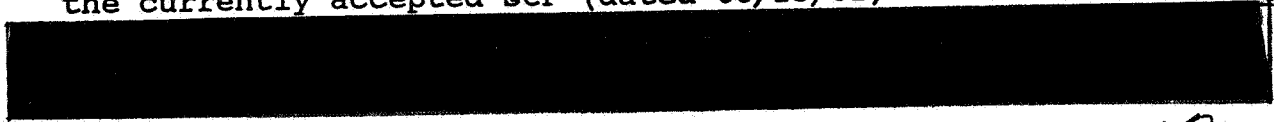
REGISTRANT: CIBA-GEIGY, Agricultural Division, Greensboro, NC *KB 2/24/92*

Actions Requested

1. The registrant submitted a new CSF (dated 01/08/91) for Metalaxyl technical to replace the currently accepted one (dated 08/25/82). RD noticed that the new CSF contains some process related impurities not disclosed in the current CSF. TB is asked by RD to give comments on this matter.
2. Review label of Metalaxyl technical for formulation into fungicides and for use on terrestrial food/nonfood crops, greenhouse nonfood crops, and interiorscapes.

Conclusions

1. TB concurs with RD that the new ^{CSF} ~~SCF~~ (dated 01/08/91) contains several process related impurities which were not listed in the currently accepted ^{CSF} ~~SCF~~ (dated 08/25/82). These included



MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

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[REDACTED] TB will have no objection to the acceptability of the new ~~SEF~~ if the registrant can provide data to demonstrate that these impurities were already present in the 1982 product.

The nominal concentration of Metalaxyl technical [N-(2,6,-dimethylphenyl)-N-(methoxyacetyl alanine, methyl ester)] was listed as 96.9% a.i. in both the new ~~SEF~~ and the label. The registrant states that this nominal concentration can serve as their label guarantee.

2. The proposed label for Metalaxyl technical is acceptable. The human hazard signal word "WARNING" was listed, reflecting the TOX CAT II classification of the eye irritation effect. Appropriate child hazard warning, precautionary statements, and statement of practical treatment were also listed. The uses listed were for formulation into fungicides, for use only on terrestrial food and nonfood crops, greenhouse nonfood crops, and interiorscapes.