

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

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OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject:

Monosodium Methanearsonate. Reregistration of ISK-Biotech Corp. Product Chemistry. DP Barcode MRID Nos. 42081200, 42081201 D171424. CBRS No.

From:

Stephen Funk, Ph.D., Chemist J. A. Junk Special Review Section T

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Through:

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Special Review Section I

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To:

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Reregistration Section 1

Accelerated Reregistration Branch

Special Review and

Reregistration Division (H7508W)

Background

ISK Biotech Corporation (formerly Fermenta ASC Corporation) has submitted manufacturing data for monosodium methanearsonate (MSMA, chemical no. 13803). The Phase 4 Review noted that temperatures pressures were not given in the description of the manufacturing process.

Discussion

The submission (MRID No. 42081201, Document Number PC-90-DGL-001-01-01) provides detailed information on the manufacture of MSMA and the starting materials used in that process. The description is complete and fulfills the requirements of Guideline 61-2. Details are provided in Confidential Appendix A.

Conclusion and Recommendation

The data gap identified under Guideline 61-2 in the Phase 4 Review is satisfied. No additional action is required for description of the manufacturing process. The registrant should note that the Phase 4 Review identified other product chemistry deficiencies.

cc without Confidential Appendix: circ.

cc with Confidential Appendix: List B Methanarsonates File, RF, S. Funk, C.Furlow (PIB, FOD).

RDI: A. Rathman:01/08/92: D.Edwards:01/08/92: E. Zager:01/08/92: H7509C:CBRS:S.Funk:305-5430:CM#2:RM803-A:SF(1191.13):12/19/91.



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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.	
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