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MAR 16 1992

Ms. Karen Stumpf
Senior Regulatory Specialist
Regulatory Affairs
CIBA-GEIGY Corporation
P.O. Box 18300
Greensboro, N.C. 27419-8300

Dear Ms. Stumpf:

Subject: Metalaxyl Technical New CSF and Label
EPA File Symbol 100-601
Your Submission Dated January 9, 1991

The Agency has reviewed your submission and has the following comments:

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

TB will have no objection to the acceptability of the new CSF 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 CSF and the label. The registrant states that this nominal concentration can serve as their label guarantee.

MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

H7505C/CDAVIS/cd/3-16-1992/Room 232/305-5542

CONCURRENCES

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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, 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.

For your information, attached is a copy of the review, If you have any questions regarding this review, please contact me on (703) 305-6900.

Sincerely yours,

Susan T. Lewis, Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosed