



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

JAN 30 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT CHEMISTRY REVIEW
EPA Registration #100-618

FROM: Treva C. Alston, Chemist
Product Chemistry Review Section
Registration Support Branch
Registration Division (7505W)

TO: Connie Welch, Pm-21
Fungicide Herbicide Branch
Registration Division (7505C)

THRU: Harold Podall, Ph.D., Section Chief
Product Chemistry Review Section
Registration Support Branch
Registration Division (7505W)

Treva C. Alston

7/6, 1/31/96

Requestor: Ciba-Geigy

EPA Registration #: 100-618

MRID #'s: 437644-01 and 437644-02

Trade Name/Code Name: Propiconazole Technical/CGA 64250

Use: Formulation into Fungicides

Introduction: This submission is for an amendment of the Confidential Statement of Formula (CSF) and labeling for this technical. The amended CSF shows an increase in the purity of the technical product and a decrease in a process related impurity [REDACTED]. The nominal percentage of the active ingredient in the CSF has also been increased. The identity of a previously declared impurity in the formula has been corrected. However this correction does not constitute a change in the impurity profile as [REDACTED] has always been present in the CGA-64250 Technical but was previously incorrectly identified.

IDENTITY AND DISCLOSURE OF INGREDIENTS**61-1: Product Identity & Disclosure of Ingredients**

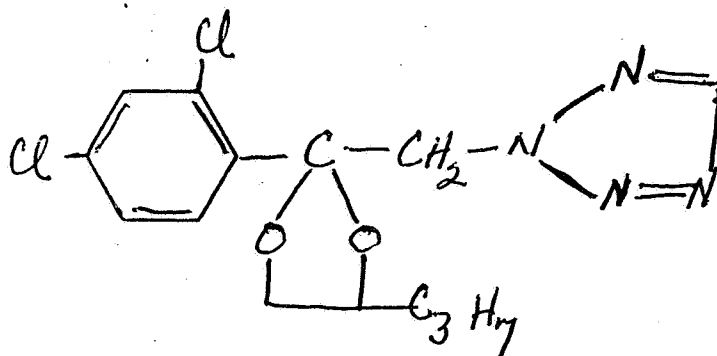
Chemical Abstract #: 60207-90-1

Empirical Formula: $C_{15}H_{17}Cl_2N_3O_2$

Chemical Name: 1-[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl-methyl]-1H-1,2,4-triazole

Molecular Weight: 342.23

Structural Formula:

**61-2: Description of Beginning Materials and Manufacturing Process**

Description of beginning materials and manufacturing process was submitted October 28, 1994. Refer to MRID # 434207-01 from the CGA-64250 phase 4 data call-in.

61-3: Discussion of Formation of Impurities

See Confidential Appendix A for this discussion.

ANALYSIS AND CERTIFICATION OF PRODUCT INGREDIENTS**62-1: Preliminary Analysis**

This is not provided in this review since this is a registered technical.

62-2: Certification of Ingredient Limits

The registrant did submit a Confidential Statement of Formula of 5/22/95 with the proposed changes. See Confidential Appendix B.

62-3: Analytical Methods to Verify Certified Limits

Capillary gas chromatography was used to analyze for the impurity discussed in the confidential appendix regarding impurities. The conditions/parameters for this analysis was a varian 3400 chromatograph with a flame ionization detector. The column consisted of fused silica, was 15 meters in length and 0.32mm. i.d.

CONCLUSIONS/RECOMMENDATIONS

The submission for an amendment to the registration of this technical grade active ingredient is acceptable.

MRSD 437644-01* 437644-02

Page _____ is not included in this copy.

Pages 4 through 7 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.

✓ Confidential Appendix

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.