

MAY 16 1996

Ms. Karen J. Stumpf
 Ciba Crop Protection
 Ciba-Geigy Corporation
 P.O. Box 18300
 Greensboro, NC 27419

Dear Ms. Stumpf:

Subject: CGA-136872 Technical
 EPA Registration No. 100-707
 Your Letter Dated November 15, 1995, Request To Amend Registration To Allow Change in Manufacture of Product That Results in a Change in the Impurities Occurring in Product; and Application To Amend the Ingredient Statement of Label from 95% a.i. to 99% a.i.; and Submission of Technical Bulletin for CGA-136872 Technical referred To on Label Received May 15, 1996

The proposed Confidential Statement of Formula (CFS) Basic Formulation submitted on EPA Form 3570-4 and dated November 10, 1995 has been reviewed and found acceptable as an amendment to the subject EPA pesticide product registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended. A copy of the toxicological review of data identified by EPA IRIS No. 405120-01 was FAXed to you on May 9, 1996. As indicated in the review the new impurities are expected to be insignificant toxicologically. A copy of the subject CFS has been added to this Agency's file for this pesticide product registration.

The proposed amendments to the subject pesticide product labeling have been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, provided that you:

1. Add the following statement under the violation statement, under the "Directions for Use" section: "For formulation into other pesticide products that may be used as herbicides in the culture of field corn and popcorn".

2. Submit one (1) printed copy of the final printed labeling before releasing the product for shipment, under the label. Labeling includes the Technical Bulletin.

CONCURRENCES					
SYMBOL					
SURNAME					
DATE					

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, Section 6(a). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure (2)

EWilson:Diskette Beacon 05-15-96

TECHNICAL BULLETIN

CGA-136872 Technical (Primisulfuron-methyl)

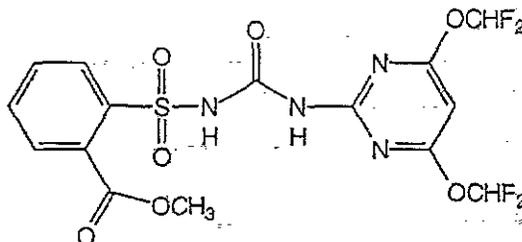
Chemical Name : 3-[4,6-bis(difluoromethoxy)-pyrimidin-2-yl]-1-(2-methoxycarbonyl-phenylsulfonyl)-urea

Chemical Abstract Number : 86209-51-0

Common Name : Primisulfuron-methyl

Company Code Number : CGA-136872

Molecular Structure :



Empirical Formula : $C_{15}H_{12}N_4O_7F_4S$

Molecular Weight : 468.3

Physical State : Crystalline solid

Color : Colorless to yellow

Odor : None

Melting Point : $\sim 200^{\circ}C$ (with decomposition)

Density ($20^{\circ}C$) : 1.62 g/cm^3 (typical)

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 16 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

100-707

Solubility (g/100ml @ 20°C):	Water:	0.00070 (pure water)
		0.00033 (pH 5, buffer)
		0.0243 (pH 7, buffer)
		0.528 (pH 9, buffer)
	acetone	3.6
	cyclohexanone	2.7
	dichloromethane	0.4
	toluene	0.05
xylene	0.03	
methanol	0.35	
isopropanol	0.04	
n-octanol	0.012	
Vapor Pressure (25°C):	1.5×10^{-10} mmHg	
Henry's Law Constant (25°C):	3.8×10^{-13} atm·m ³ /mol	
Octanol/Water Partition Coefficient (25°C):	logP _{ow} = 0.0592	
Dissociation Constant (pK _a):	pK _a = 5.1 (acidic)	
pH (25°C):	5.56 (saturated solution)	
Stability:	<math><1\%</math> decomposition after 12 months at 35°C	

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(Pressure Sensitive Label)

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAY 16 1996

CGA-136872 Technical

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
100-707

_____ Pounds (_____ Kgs.)

Net Weight

For Formulation Into Herbicides For
Weed Control in Field Corn and Popcorn

Made in Switzerland

Active Ingredient:

Primisulfuron-methyl:

3-[4,6-Bis(difluoromethoxy)-pyrimidin-2-yl]-

1-(2-methoxycarbonylphenylsulfonyl)urea 99%

Inert Ingredients: 1%

Total: 100%

KEEP OUT OF REACH OF CHILDREN

EPA Est. 43788-SW-1

EPA Reg. No. 100-707

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DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of Ciba-Geigy or the Seller. All such risks shall be assumed by the Buyer.

Ciba-Geigy warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. Ciba-Geigy makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Ciba-Geigy or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. Ciba-Geigy and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Ciba-Geigy.

No end use of this product other than formulation is intended or implied by the above Conditions of Sale and Warranty.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Note to Formulators:

Formulators are responsible for providing data to support registration of products formulated from CGA-136872 Technical.

Chemical and Physical Properties

Refer to the Technical Bulletin for CGA-136872 Technical.

Storage and Disposal

Pesticide Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Store in a cool, dry, well-ventilated area. Wastes resulting from the use of this product are toxic. Improper disposal of unused pesticide is a violation of federal law. Pesticide, mixtures, or equipment rinses that cannot be chemically reprocessed according to label instructions must be disposed of according to federal, state, or local procedures. For guidance in proper disposal methods, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office.

Container Disposal

Completely empty liner by shaking and tapping sides and bottom of fiber drum to loosen clinging particles. Empty residue into formulation equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

For minor spills, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. In the event of a major spill, fire or other emergency, call 1-800-888-8372, day or night.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

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Harmful if absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment

If in eyes: Flush eyes with plenty of water and get medical attention if irritation persists.

If on skin: Wash with plenty of soap and water.

If inhaled: Move to fresh air.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters, unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

U.S. Patent No. 4,478,635

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Imported by

Ciba Crop Protection
Ciba-Geigy Corporation
Greensboro, North Carolina 27419

CGA 93L1C 056

Registered May 11, 1990
Revised September 8, 1992
PR Notice 91-8
Revised February, 1994
PR Notice 93-10
Revised May, 1996 - Process
change - higher ai
purity to 99%