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FROM: T. G. Grumbles

DATE: March 31, 1986

Interoffice
Communication

SUBJ: VMC 100 REGISTRATION: MEETING WITH KELLER & HECKMAN

VISTA

A meeting was held with Keller & Heckman staff on March 25 to discuss status of the subject registration. Sandy Dennis and Check Broeder are the primary staff contacts with Peter de la Cruz providing supervision. Broeder is a staff scientist for the firm. Options for registering and progress to date were discussed. The discussions are summarized below.

1. Keller & Heckman has had little success in getting informal guidance from the agency on the existence of data gaps or intended uses for current registrants. They have filed two FOI requests (attached) to try and obtain this information. The product manager at EPA for this class of chemicals is new and is reluctant to give opinions. Keller & Heckman felt it was reasonable to structure the registration for a carbon number range (i.e., C₁₀-C₁₄) material if the data reasonably supports that.
2. I reviewed with them where we were on translations, data collection etc. I told them we felt that we could have all the information available pulled together by May 1 and maybe sooner. The indicated that we should begin filling in the forms and sending them information to review when available.

Based on our discussions, those involved at Keller & Heckman feel we have a fair chance of success in submitting the form without wildlife data and explaining why we feel it's not needed or applicable. The EPA does have regulatory flexibility to grant a waiver of data requirement. Based on the above, I feel we should move to submit an application without the wildlife data, but with supporting documentation on why it's not included.

Following are the current action items:

1. Continue to try and contact current customers with registration. (OCK)
2. Begin to prepare the "Waiver of Data" paragraph for wildlife data. This should include the following elements. (TGG, AN)
 - a. Applicability - biodegradation, environmental persistence, similar chemical testing if available.
 - b. This use will be small increment to current environmental releases.

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- c. FDA sanctions (sanitizing solutions).
- 3. Begin to draft the required FIFRA label. (TGG)
- 4. Organize the data and place on registration forms as it becomes available. (All)

Completing the above should get us to our goal of submitting a registration to the agency as soon as possible. Please let me know if you have questions on the above. As more information becomes available, we will want to discuss the options to assure a timely registration.


Thomas G. Grumbles

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