

TO: Chris Pierson

TGG: JCL: ERT: MJH: AJO: RF

XF: _____

FROM: T. G. Grumbles
DATE: October 16, 1989

Interoffice
Communication

SUBJ: LPA SOLVENTS: INERT USE

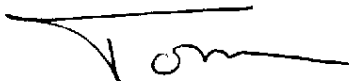
VISTA

Attached is the letter from EPA notifying us of the establishment of a master file for the solvents and verifying that LPA solvents meet certain definitions in 21 CFR 172.884, therefore by reference, certain definitions in 40 CFR 180.1001, Inerts Exempt From Tolerances List.

EPA has indicated to me that the significance of these events is not that great, and certainly not as important as our customers seem to indicate. However, it should help our marketing efforts when we're trying for inert substitutions.

I'd like to discuss the pesticide regulatory scheme with the new solvent "troops" some time. Any thoughts on a good time or forum?

Please distribute this as appropriate.



T. G. Grumbles

dlj

cc: W. L. McClain, J. A. Hall

Attachment

VVV 000014234



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

9/22/89

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Thomas G. Grumbles
Environmental Quality Manager
Vista Chemical Company
15990 N. Barker's Landing Road
P.O. Box 19029
Houston, TX 77224

Dear Mr. Grumbles:

This responds to your letter of March 2, 1989 and fax of September 12, 1989. We have completed our review of your request and have determined that, according to the composition and properties including the UV spectrum for Vista LPA-210 solvent, it meets the definition of "odorless light petroleum hydrocarbons" as specified in 21 CFR 172.884. By reference, it also meets the requirements for petroleum hydrocarbons described in 40 CFR 180.1001(c), (d), and (e).

Although UV spectra were not supplied for Vista LPA and LPA-140 solvents, it is expected that, based on the similarity of their compositions to Vista LPA-210, they will also meet the requirements of "odorless light petroleum hydrocarbons". This determination is the responsibility of the supplier.

In accordance with your request, we are establishing a Master File for Vista Chemical Company. The Master File is required to protect confidential (proprietary) information pertaining to the "inert" component of a pesticide. Therefore, any proprietary information supplied to us by Vista Chemical Co. in the future will be placed in this file.

Sincerely,

Lynn M. Bradley

Lynn M. Bradley, Section Head
Product Chemistry Review Section
Registration Support Branch
Registration Division (H7505C)

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