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1F Desk - TGL

February 27, 1986

VISTA

Ms. Sandra Dennis
Keller and Heckman
1150 17th Street, N.W.
Suite 1000
Washington, DC 20036

Dear Sandy:

Per our discussion, below is a brief listing of the data we have available or can obtain from literature sources to support the application. I have also enclosed the following:

1. Material Safety Data Sheet
2. Technical Data Sheet
3. Technical paper on VCM-100 mechanism of action
4. Copy of applicable pages from the data submitters file
5. Domestic LAS production figures

DATA AVAILABLE

1. Product Chemistry

This data, except for octanol/water partition coefficient is available on the product. We can obtain the needed octanol/water data in short order.

2. Residue Chemistry

As described in your memo of March 11, 1985, I believe we would have what's needed.

3. Environmental Fate

A. Lab Degradation Studies - We have this data.

B. Hydrolysis in Water - This product does not hydrolyze.

C. Photodegradation in Water - We have found one Japanese study that should have suitable data. It needs translation.

D. LAB Metabolism on Aerobic Soil - This product is well known to degrade aerobically in water or soil. There is a lot of data on water degradation but little is available on aerobic soil. There is sediment data, such as river bottoms, and several Japanese papers available.

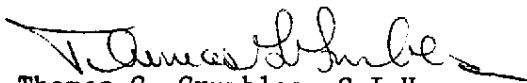
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- E. Leaching and Adsorption/Desorption Data - We have a translation of a recent German article on sediment and there are Japanese studies available.
- F. Dissipation Studies in Soil - A series of Japanese articles is available.
- G. Accumulation in Fish - There is an SDA sponsored industry study available.
- 4. Toxicology - We have the acute mammalian data available.
- 5. Wildlife and Aquatic Organisms - Not available to Vista.

As we have discussed, the Japanese articles will have to be translated. Based on the abstracts, we are hoping the data would be sufficient for the application.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

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Enclosures

cc w/o enc. - Alan Nielsen
Carl Kerfoot
Wayne Hilgers

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