

TO: O. C. Kerfoot, A. M. Nielsen, D. Smith

FROM: T. G. Grumbles

DATE: June 8, 1987

SUBJ: VMC-100 PESTICIDE REGISTRATION

Interoffice
Communication

VISTA

Attached is a copy of our notice from EPA regarding the conditional registration for VMC-100. As we knew, further studies will be required to receive full registration. Also, minor modifications are required for the label. I'm not sure what Item 2 of the letter refers to, but I believe nothing is required unless there is a data call-in on this type of product.

We need to review the items in condition 1 to determine applicable test protocols and what resources are required to complete the studies. I believe that the four tests in item (a) will be the best choice. Please review the attached and be prepared to discuss in the near future. I will attempt to schedule a conference call in the near future. Below are the specific action items for the short term and responsible parties.

1. Agree in writing to conditions of the May 28 notification - TGG.
2. Review additional testing requirements and identify needs- Kerfoot, Nielsen, Smith.
3. Review with Bruce Larsen desirability of pursuing joint studies with BFG - TGG.
4. Make label modifications and get labels produced - TGG.
5. Notify Hammond plant and register plant as pesticide-producing facility - TGG.
6. Notify Hammond of additional administrative requirements for VMC-100 sales - TGG.

Unless I hear serious concerns regarding our ability to meet the conditions of EPA or commercial issues, I will send the required commitment letter to EPA on Friday, June 12.

T. G. Grumbles
T. G. Grumbles /ajo

ajo

cc (w/EPA letter only)

P. L. Jernigan
W. L. McClain
B. E. A. Larsen
P. C. Gowan
J. Laird
M. Tonkovich
J. Maher

VVV 000008826

US ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDES PROGRAMS REGISTRATION DIVISION (TS-767) WASHINGTON, DC 20460	EPA REGISTRATION NO. 56602-1	DATE OF ISSUANCE 28 MAY 1987
NOTICE OF PESTICIDE: ☒ REGISTRATION ☐ REREISTRATION (Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)		
NAME OF PESTICIDE PRODUCT VMC-100 MINING CHEMICAL		
NAME AND ADDRESS OF REGISTRANT (Include ZIP code)		
VISTA CHEMICAL CO. 15990 North Barker's Landing Rd. P.O. Box 19029 Houston, Texas 77224 Route: _____ Copy: _____ File: _____ X-7: _____		
NOTE: Changes in labeling formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above U.S. EPA registration number.		
On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.		
A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.		
Registration is in no way to be construed as an indorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.		
This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) and (B) provided that you agree in writing that: 1. You submit one of the two sets of data requirements listed below, conducted in accordance with test guidelines, no later than the the time period specified opposite each study. a. ° Hydrolysis, at pH 3 and pH 7 (161-1) - 6 months from date of issuance of this notice. ° Aerobic Soil Metabolism (162-1) - 2 years from date of issuance of this notice. ° Leaching and adsorption/desorption (163-1) - 6 months from date of issuance of this notice. ° Soil field dissipation (164-1) - 2 years from date of issuance of this notice.		
VVV 000008827		
☐ ATTACHMENT IS APPLICABLE		
SIGNATURE OF APPROVING OFFICIAL		DATE

- b. A protocol for field monitoring studies to be conducted under proposed use conditions on not more than 10 acres. Residues of LAS degradates must be addressed. Include details of proposed analytical methodology. The test protocol must be submitted 6 months from date of issuance of this notice. The actual test data must be submitted 2 years from approval of the protocol.
- 2. You will submit and or cite all data required for registration/reregistration if your product under FIFRA sec. (3)(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 3. You will make the following label changes before you release the product for shipment.
 - a. The preferred declaration for the active ingredient, based on the analysis, should be:

Alkyl* sodium benzene sulfonate

*Alkyl (C₁₀-C₁₄)
 - b. Pesticide disposal instructions for this product should be:

Pesticide Disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

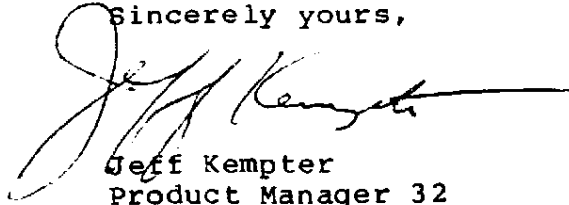
Container disposal instructions should have a "Container Disposal" heading.
 - c. Add the phrase "EPA Reg. No. 56602-1".

See the attachments for further instructions in meeting the requirements of this notice.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

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

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Jeff Kempter", with a long horizontal flourish extending to the right.

Jeff Kempter
Product Manager 32
Disinfectants Branch
Registration Division (TS-767c)

Enclosures

cc: Thomas Grumbles, Vista Chemical Co.

VVV 000008829