

TGG: JCL: MMG: RF

XF: 71 FRA

TO: Mike Fortier

FROM: T. G. Grumbles

DATE: October 17, 1988

Interoffice
Communication

SUBJ: TSCA ALCOHOL AS PESTICIDES

VISTA

The regulatory definition of "pesticide" is very broad. Specifically the regulatory definition is as follows:

The term "pesticide" means (1) any substance or mixture of substances intended for preventing, destroying, repelling or mitigating any pest, and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant or desiccant:....

In summary herbicides are a subclassification of pesticides for the purposes of regulatory classification and any registration requirements. TSCA alcohols (810 and 10) were registered in 1978 as pesticides. No further registration is needed for those products.

As discussed in my 9/26 memo, the only real impact for us is having to report production volumes for products we know are put into "active" pesticide use in an unaltered state. If the products are from a plant other than LCCP or Hammond, we will have to register the plant. Registering the plant as a pesticide producing facility is a relatively simple paperwork exercise.

Perhaps an example would help. Several years ago we became aware of a customer registering LP as a pesticide. We did not register or market LPA as a pesticide. With the new regulation, we would now have to annually report the LPA sales to that customer. Also, if LCCP wasn't already registered as a pesticide producing facility we would have to do that.

Hopefully the above clarifies the situation.



T. G. Grumbles

dlj

cc: Wayne Hilgers
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VVV 000012097