

Vista Chemical Company

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TGG: JCL: ERT: MJH: AIO: RF

July 24, 1990

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VISTA

Ms. Candice W. Huang, Ph.D.
ICI Agricultural Products
Western Research Center
1200 South 47th Street - Box 4023
Richmond, CA 94804-0023

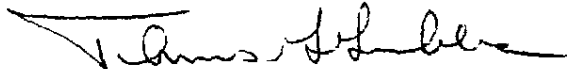
Dear Dr. Huang:

This letter is to confirm Vista's position that Vista LPA Solvents are exempt from tolerances under FIFRA regulations, specifically 40 CFR 180.1001(c) and (d).

A letter from USEPA confirming that Vista LPA, LPA-140, and LPA-210 meet the definition of "odorless light petroleum hydrocarbons" as specified in 21 CFR 172.884 and therefore, by reference, meet the requirements for petroleum hydrocarbons described in 40 CFR 180.1001(c) and (d).

At the time this agency opinion was received Vista did not have an LPA 130 and LPA 170 Solvent, but Vista believes they also would meet the above specifications.

Sincerely,



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

dlj

cc: Chris Pierson

K. C. Lin, PHD
ICI Agricultural Products

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