



Chevron Chemical Company

Richmond, California
November 16, 1976

RDC

152.31
ppg emetic

PARAQUAT REGISTRATION -
SAFENED FORMULA
File No.: 771.1996

D. B. BARLOW:

Reference is made to a meeting held between Marketing and R&D on October 4, 1976, relative to our overall program for the registration of the emetic formulation.

At that meeting, Marketing and R&D agreed on all aspects of the strategy to be followed in the development of the new safened formulation except for some questions that were raised by the Toxicology Group relative to the effectiveness of the recommended use rate of the emetic. Subsequent correspondence with PPD and with CTL have confirmed that the recommended rate of the emetic agent represents as good a proposal as possible based on available information.

I have subsequently discussed these recommendations with both Earl Stripling and yourself and have had verbal concurrence to proceed as outlined. The purpose of this memo is to summarize for the record the registration program which we will be undertaking during 1977.

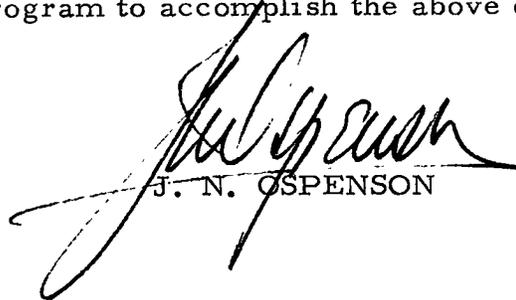
The following summarizes the major points agreed upon for our 1977 program:

1. We will proceed with a positive program for the registration of a new safened formulation as soon as possible. To implement this, we plan to submit a request for exemption from tolerance for the emetic agent to the EPA as soon as possible. In order to insure that we supply the same information to the EPA as was made available to the British government, John Braunholtz has agreed to send us a copy of the UK submission including all referenced toxicological information. Our submission date to the EPA will be limited by when we receive the required information from PPD.
2. It was agreed that we would proceed to ultimately register and label a product containing both the stenching agent and the emetic.
3. We will proceed to develop all additional needed data during 1977 to permit the registration of this product in 1978. This required work would include efficacy, residue and various aspects of toxicology and hazard evaluation.

4. It is anticipated the first sales of the safened formulation could not occur until late 1978 at the earliest. If EPA does not accept the concept of this emetic agent as an inert ingredient in pesticidal formulations, our entire schedule for the registration of this will have to be revised.

It was further agreed within our groups that there would be no public announcements or publicity relative to this type of safened formulation. However, it will be necessary to work outside of our own shop with this product and since it will be offered for sale in many parts of the world during 1977, our confidentiality requirements can be relaxed after this date. However, we should be careful that no publicity be given to this development and that any toxicological questions be routed through Industrial Hygiene group and the Central Toxicology Laboratories of ICI.

By copy of this memo, I am requesting that the R&D people concerned develop the necessary registration program to accomplish the above objectives.



J. N. O'SPENSON

JNO:jb

cc: L. R. Stelzer
E. L. Stripling, Jr.
C. R. Tanner
B. F. Quisenberry
H. G. Franke
R. D. Cavelli