

21.01 80

May 17, 1977

Dr. Alan Calderbank  
Jealott's Hill Research Station  
Bracknell Berkshire  
RG12 6EY ENGLAND

Dear Alan:

This letter refers to the telex by J.N. Ospenson to J. Braunholtz of 5/9/77. The telex dealt with the EPA rejection of the paraquat emetic submission. Please find attached Nils' memo to the files describing in more detail, our notification by EPA and our next steps. I will let you know as soon as something new develops.

Many thanks also for your letter of May 9, 1977 and the two copies of Report TMJ 1500A entitled "Diquat Residue Summary: Residues in fruit and vegetable crops following pre and post-emergence treatment with DQ for weed control (period 1961-1976)".

I also confirm sending the following telex to you:

THANK YOU FOR MEETING DATES. WE ARE OUT OF PQ  
STANDARD, CAN YOU SUPPLY 300 GR?

Still no word on paraquat RPAR.

Sincerely yours,



H.G. Franke

HGF:csd

Enclosure

Jealott's Hill Research Station  
 Bracknell Berkshire  
 RG12 6EY

Telephone Bracknell 24701  
 Telex 668411  
 Cables & Telegrams Plantector Bracknell Telex



Imperial  
 Chemical  
 Industries  
 Limited

Plant  
 Protection  
 Division

Dr H G Franke  
 Chevron Chemical Company  
 Ortho Division  
 940 Hensley Street  
 Richmond  
 California 94804  
 USA

Your ref                      Our ref  
    AC/TH

CHEVRON CHEMICAL CO. ORTHO DIV. R & D DEPT.	
MAY 16 '77	
Rtc	Note
	J. N. Swenson
	J. Bell
	C. M. Crutchfield
	V. Bearman
✓	H. G. Franke
	J. C. Hawkes
	J. N. Lea
	B. F. Quisenberry
	C. R. Lewis
2	L. K. Steizer
2	J. G. Vaska
R & D FILES	

Date  
 9 May 1977

Dear Hans

Please find attached two copies of Report TMJ 1500A entitled "Diquat Residue Summary : Residues in fruit and vegetable crops following pre- and post-emergence treatment with DQ for weed control (period 1961-1976)" for your records.

Thank you for your letter of 21 April with attached notes of our February meetings with which I concur.

I also acknowledge receiving your telex suggesting August 29, 30 and 31 for our next liaison meeting at Jealott's Hill. August 29 is a public holiday in England, but I am following up suitability of the other two days with colleagues and will let you know as soon as possible.

Yours sincerely,

*Alan*

A Calderbank

*1 copy to  
 Hans  
 1 to BVT*

*add to  
 14/5/77  
 ① Enshelc 22/5/77  
 ② JCF 4/5/77  
 ③  
 Deal 2/10/77  
 1/77*

Enc.



*DB-111111*  
*FBI*

Chevron Chemical Company

Richmond, California  
May 11, 1977

① H.G. Franke

PARAQUAT EMETIC PETITION -  
EPA RESPONSE

~~MEMORANDUM TO THE FILES:~~

I received a telephone call on Friday, May 6, from Mr. John Shaughnessy of the Chemical Branch of EPA, informing me that Toxicology Branch had returned our request for exemption from tolerance for the emetic agent for use in our paraquat emetic formulation. Mr. Shaughnessy indicated that he knew we would be interested in learning this as soon as possible. He indicated that a letter summarizing all the questions would be sent to us but he seemed to imply it might be a long time before it arrives.

Mr. Shaughnessy indicated that there were many questions raised relative to our request for exemption to tolerance, but the main ones were:

1. The Toxicology Branch indicated that in their opinion we would have to have a new drug clearance for this product before they would consider our application any further.
2. A question was raised as to whether EPA would allow the use of a drug in a pesticide formulation even if the drug were registered with the FDA. He indicated that it was suggested that we should contact a Dr. Richard J. Crout, Food and Drug Administration, 5600 Fishers Lane, Rockville, Maryland 20852, for further clarification.

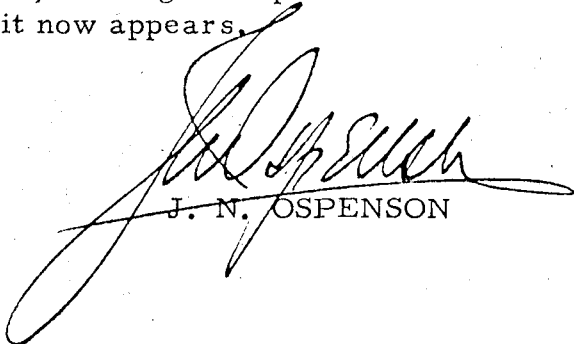
It was further emphasized that EPA does not plan to review our petition any further. He indicated that he would put our entire submission in a box and if we wished to have them returned to us he would be happy to do so.

We more or less felt that our initial petition for clearance of the emetic agent as an inert in pesticide formulations would be refused, but it comes a little bit as a surprise that they indicate the need to have the material cleared as a drug prior to considering any further the use of it in a pesticide formulation.

By copy of this memo I am requesting that Lorin Stelzer contact Dr. Crout and Mr. Shaughnessy for any further information that they could offer. Based upon this new information and a review of the requirements for

registration of this as a drug, we may have to review our entire registration program for the paraquat emetic formula.

Also in view of this new situation, the possible plan to attempt to have only the emetic formula registered in the U. S. , as a deterrent to the introduction of Taiwanese paraquat, may no longer be possible if such a registration is as time-consuming as it now appears.



J. N. OSPENSON

JNO:jb

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