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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Brent Solomon
Valent USA Corp.
1401 Eye Street, N.W.
Suite 220
Washington, DC 20005

SUBJECT: NALED: Draft Environmental Fate and Ecological Effects Chapter, November 14, 1997

Dear Mr. Solomon:

The Agency has revised the Environmental Fate and Effects chapter for use in the Reregistration Eligibility Decision (RED) for Naled. A copy of the analyses are enclosed for your review.

Please note that in accordance with 40 CFR 158, all environmental fate and ecological effects data requirements have been fulfilled to support reregistration. However, confirmatory data are needed for the guidelines listed below:

72-4(a) Early Life Stage Fish (estuarine/marine); and
72-4(b) Life Cycle Invertebrate (estuarine/marine).

The risk assessment evaluates the environmental and ecological impacts associated with the use of naled. This information will be used to develop the regulatory decisions in the RED. As such, the Agency encourages Valent to carefully review this information, to provide comments on the risk assessment and to submit mitigation measures that will reduce the potential risks. Please comment on any errors, such as computational or mathematical mistakes within 30 days of receipt of this letter. During the public review and comment period, there will be additional time to provide other comments.

As discussed in earlier conversations, the Agency intends to open a docket for Naled on August 10, 1998. Valent's comments on the revised Environmental Fate and Effects chapter will

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be reviewed by the Agency for 30 days. Following the Agency's review, the Environmental Fate and Effects chapter, Valent's comments and any comments prepared by the Agency will be placed in the docket.

If you have any questions or comments or questions, please contact Diane Isbell at (703) 308-8154.

Sincerely,

Kathy S. Monk, Chief
Reregistration Branch II
Special Review and
Reregistration Division (7508W)

Enclosure