Message

From: Thomas Marvin [thomas.marvin@bayer.com]
Sent: 10/20/2020 8:32:59 PM
To: Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]
Subject: RE: Courtesy copy
Attachments: MASTER LABEL_XtendiMax_264-RERN_20201020.pdf; MASTER LABEL_XtendiMax_264-RERN_20201020_redline.pdf

And, here is a courtesy copy of the revised label we just submitted (clean and redline versions with comments).

From: Thomas Marvin
Sent: Tuesday, October 20, 2020 2:00 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Ed Messina <Messina.edward@epa.gov>
Subject: RE: Courtesy copy

Below is the proposed revised T&C language (highlighted section is new). The revised label will be returned very soon (today).

So long as the XtendiMax registration continues to require use of a VRA with every application, Bayer will:

1. Take appropriate action(s) to ensure that a sufficient supply of VaporGrip Xtra or any other appropriate VRA is in the channels of trade for all XtendiMax applications each year. To ensure the supply of VRA is sufficient throughout each season, Bayer will: (1) project and monitor distribution of XtendiMax; (2) monitor available VaporGrip Xtra/VRA in relevant channels of trade; (3) make available additional supplies as may be needed; and (4) maintain capacity to produce additional VaporGrip Xtra/VRAs (or to cause more VaporGrip Xtra/VRAs to be produced) whenever any further need is anticipated.

2. Make arrangements through appropriate distribution networks to ensure that VaporGrip Xtra or other appropriate VRAs are timely available to applicators in all locations where XtendiMax will be applied, before any applicator would apply XtendiMax. Access to VaporGrip Xtra will either be through the same retail outlets as XtendiMax, or if necessary in particular locations, available from other readily accessible sources. Registrant will timely make available to every applicator information on where VaporGrip Xtra can be ordered or purchased.

3. Ensure that all training materials clearly require the mandatory use of VaporGrip Xtra or another VRA with every XtendiMax application. Work with State authorities to ensure that appropriate training occurs before any application of XtendiMax is made.

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Tuesday, October 20, 2020 1:43 PM
To: Thomas Marvin <thomas.marvin@bayer.com>; Goodis, Michael <Goodis.Michael@epa.gov>; Ed Messina <Messina.edward@epa.gov>
Subject: RE: Courtesy copy

Thank you.

Also expecting today:

- Revised T&C language on pH buffer per discussion with Alex yesterday
- Revised labels per our comments on Friday

From: Thomas Marvin <thomas.marvin@bayer.com>
Sent: Tuesday, October 20, 2020 8:57 AM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
Subject: Courtesy copy

FYI on attached courtesy copy of a submission Bayer completed yesterday-- a copy of the former website that was developed for the 2018 registration, which will be updated as required to reflect the terms of any new registration.

Tom