Message

From: Verhougstraete, Brian (MDARD) [verhougstraeteb@michigan.gov]
Sent: 4/2/2019 3:34:40 PM
To: Ajayi Olafimihan (Olafimihan.Ajayi@illinois.gov) [Olafimihan.Ajayi@illinois.gov]; Alessandri, Gina (MDARD) [AlessandriG@michigan.gov]; Beal@agri.ohio.gov; belt [jbelt@agri.ohio.gov]; Beaver, Brad [brad.beaver@illinois.gov]; Wilkinson, Bruce [wilkinson.bruce@epa.gov]; buesinge@uiuc.edu; Calvo, Estrella [calvo.estrella@epa.gov]; Carter, Elizabeth C [carter14@purdue.edu]; christine.wicks@state.mn.us; Colwell, Curt [curt.colwell@illinois.gov]; dan.stoddard@state.mn.us; deanh@tc.umn.edu; Dibblee, Seth [Dibblee.Seth@epa.gov]; Baumgartner, Donald [baumgartner.donald@epa.gov]; Doug.Owens@Illinois.gov; Dustin Roy [Dustin.Roy@whiteearth-nsn.gov]; Escobar, Antonio (MDARD) [escobara@michigan.gov]; greg.cremers@state.mn.us; Hill, John (MDARD) [HillJ1@michigan.gov]; hoida016@umn.edu; jane.larson@wisconsin.gov; joe [becovitzj@purdue.edu]; Jones, Margaret [jones.margaret@epa.gov]; Jordan, Ronza [jordan.ronza@epa.gov]; joshua.stamper@state.mn.us; MaGee, Julie [magee.julie@epa.gov]; kelleyj@purdue.edu; kells002@umn.edu; Klevs, Mardi [klevs.mardi@epa.gov]; Leach, Carrie A [leach13@purdue.edu]; Leonova, Larisa [leonova.larisa@epa.gov]; Lori Bowman [Lori.Bowman@Wisconsin.gov]; Lowery-Martin, Sharon [lowery-martin.sharon@epa.gov]; Martin, Andrew G [martinag@purdue.edu]; matthew.sunseri@state.mn.us; Messina, Edward [Messina.Edward@epa.gov]; Mott, Molly (MDARD) [mottm@michigan.gov]; Mysz, Amy [mysz.amy@epa.gov]; Niess, Claudia [niess.claudia@epa.gov]; O'Lone, Kimberly [OLone.Kimberly@epa.gov]; pnixon@illinois.edu; Reed, Leo A [reedla@purdue.edu]; Rittenhouse, Susan [Rittenhouse.Susan@epa.gov]; Personette, Robby E - DATCP [robby.personette@wisconsin.gov]; roger.mackedanz@state.mn.us; rose.155@osu.edu; Ryan King [ryan.king@agri.ohio.gov]; Sarah Caffery [scaffery@purdue.edu]; saxtong@purdue.edu; scottde@purdue.edu; scott.frank@illinois.gov; Star, David [star.david@epa.gov]; stomasko@wisc.edu; stonejo2@msu.edu; Moss, Suzanne [suzanne.moss@illinois.gov]; tclevela@illinois.edu; thbrown@umn.edu; thoffman@agri.ohio.gov; Waltz, Robert D [rwaltz@purdue.edu]; Wan, Ping [wanp@purdue.edu]; Goetsch, Warren [Warren.Goetsch@Illinois.gov]; ewhite@purdue.edu; Whitford, Fred . [fwhitford@purdue.edu]; Zimmer, Jeffrey (MDARD) [zimmerj@michigan.gov]
Subject: FW: FW: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations

SLA's,
Please see the emails below from Liza Fleeson Trossbach and Rose Kachadoorian concerning EPA's recent announcement about 24c registrations. The links below appear to be broken, but here is a link to the EPA announcement for your reference: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations

We will be discussing this topic at Pre-SFIREG next month.

Regards,
Brian

Brian Verhougstraete, Pesticide Registration & Certification
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www.michigan.gov/mdardpestcert

From: Trossbach, Liza <liza.fleeson@vdacs.virginia.gov>
Sent: Monday, March 25, 2019 1:08 PM
To: Anthony Lamanno <aclamann@gw.dec.state.ny.us>; Verhougstraete, Brian (MDARD) <verhougstraeteb@michigan.gov>; John McHugh <john.mchugh@hawaii.gov>; Kelle Davis <KMDavis@agr.wa.gov>;

Leslie Smith <leslie.smith@texasagriculture.gov>; Mary Begin <mary.begin@dc.gov>; Taryn LaScola <taryn.lascola@state.ma.us>; Tim Creger <tim.creger@nebraska.gov>; Tim Drake <tdrake@clemson.edu>; Tom Gere <tom.gere@state.sd.us>
Cc: Rose Kachadoorian <rkachadoorian@oda.state.or.us>
Subject: Fwd: FW: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations

Good afternoon...

Reference the email below, while AAPCO intends to send a letter and states are encouraged to submit written comments to EPA, Full SFIREG has been asked to gather comments/concerns regarding

Deliberative Process / Ex. 5

Responses can be sent directly to me. The favor of your response by Friday, April 5, COB would be appreciated.

Thank you in advance.

LFT

Liza Fleeson Trossbach
Program Manager | Office of Pesticide Services | Virginia Department of Agriculture and Consumer Services |
102 Governor Street, Room LL18, Richmond VA 23219 |
804-371-6559 (office) | 804-371-2283 (fax)

---------- Forwarded message ---------
From: **Amy Sullivan** <aapco.sfireg@gmail.com>
Date: Tue, Mar 19, 2019 at 10:35 AM
Subject: FW: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations
To: Amy Sullivan <aapco.sfireg@gmail.com>

Forwarded by AAPCO

Amy Sullivan
Executive Secretary
AAPCO-SFIREG
406-431-3176
https://aapco.org
https://twitter.com/aapcoexecsec

On 3/19/19, 10:04 AM, "Roseann Kachadoorian"
<rkachadoorian@oda.state.or.us> wrote:

>Yesterday AAPCO members learned that EPA is now re-evaluating its

>approach to reviewing FIFRA Section 24(c) "requests", and the
>circumstances under which it will exercise its authority to disapprove
>those requests.
>See,
>https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registration
>s .
>
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>

Deliberative Process / Ex. 5

>The AAPCO Board of Directors is in the process of developing a letter to
>EPA. State Lead Agencies are strongly encouraged to contact EPA in
>writing to state their concerns. Do not hesitate to contact AAPCO if you
>have comments that you would like to share.
>
>Thank you
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>
>Rose Kachadoorian
>AAPCO President
>Pesticides Program Manager,
>Registration, Licensing and Certification
>Natural Resource Policy Area
>Oregon Department of Agriculture
>635 Capitol Street NE
>Salem, Oregon 97301
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>
>Leo A. Reed
>AAPCO President Elect
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>175 S. University
>West Lafayette, IN 47907
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>www.oisc.purdue.edu
>reedla@purdue.edu
>
>https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registration
>s
><https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registratio
>ns>
>Posted 03/19/19
>This is the time of year that EPA receives many special local needs
>registration requests from states under section 24(c) of FIFRA. Section
>24(c) states that "A State may provide registration for additional uses
>of federally registered pesticides formulated for distribution and use
>within the State to meet special local needs . . ." EPA currently
>receives approximately 300 24(c) requests annually. Many of these
>requests are for additional uses not considered by the federal label
>e.g., applying the pesticide to a different crop to address an outbreak
>of disease, adding an alternative application method that suits the
>practices of that state, or adding a new pest species that is not on the
>federal label. However, some requests are to narrow the federal label,
>such as to add a more restrictive cut-off date, to add training and
>certification requirements, or to restrict the use directions
>by limiting the number of treatments permitted by the federal label.
>Due to the fact that section 24(a) allows states to regulate the use of
>any federally registered pesticide, and the fact that some states have
>instead used 24(c) to implement cut-off dates (and/or impose other
>restrictions), EPA is now re-evaluating its approach to reviewing 24(c)
>requests and the circumstances under which it will exercise its authority
>to disapprove those requests. Before making any changes in this regard,
>EPA intends to take public comment on any potential new approaches before
>adopting them.
>EPA is not making any immediate changes in this area and does not expect
>any potential changes will impact 24(c) requests that states submit ahead
>of the 2019 growing season.
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