Message

From: McNally, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EFA5514317E34B9895687D73730FDDE9-ROBERT MCNALLY]
Sent: 10/25/2018 4:00:01 PM
To: Jones, Russell [Jones.Russell@epa.gov]; Leahy, John [Leahy.John@epa.gov]; Ellis, Frank [Ellis.Frank@epa.gov]
Subject: RE: PBS Guidance - One last look before I send to Prasad in FEAD

If it does address her comment, and is accurate, please send to FEAD.

Thanks

Bob

From: McNally, Robert
Sent: Thursday, October 25, 2018 11:56 AM
To: Jones, Russell <Jones.Russell@epa.gov>; Leahy, John <Leahy.John@epa.gov>; Ellis, Frank <Ellis.Frank@epa.gov>
Subject: FW: PBS Guidance - One last look before I send to Prasad in FEAD

See below. I think this is a better way to say it, and accurate. Russ, does this address her comment?

From: McNally, Robert
Sent: Thursday, October 25, 2018 11:46 AM
To: McNally, Robert <Mcnally.Robert@epa.gov>
Subject: Fwd: PBS Guidance - One last look before I send to Prasad in FEAD

Sent from my iPhone

Begin forwarded message:

> **From:** "Jones, Russell" <Jones.Russell@epa.gov>
> **Date:** October 25, 2018 at 9:26:38 AM EDT
> **To:** "McNally, Robert" <Mcnally.Robert@epa.gov>
> **Cc:** "Ellis, Frank" <Ellis.Frank@epa.gov>, "Leahy, John" <Leahy.John@epa.gov>, "Borges, Shannon" <Borges.Shannon@epa.gov>
> **Subject: RE: PBS Guidance - One last look before I send to Prasad in FEAD**
>
> Bob:
>
> The short answer is YES. But..... there are substances that do not fit within the exclusions, but are still not within the definition of a plant regulator. Examples would be osmoregulatory substances (glycine betaine), or other substances that may reduce transpiration, increase photosynthetic rate, or protect against temperature extremes. The list could be endless. How about the following teaks in Blue:

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Russ

From: McNally, Robert
Sent: Wednesday, October 24, 2018 4:55 PM
To: Jones, Russell <Jones.Russell@epa.gov>
Cc: Ellis, Frank <Ellis.Frank@epa.gov>; Leahy, John <Leahy.John@epa.gov>; Borges, Shannon <Borges.Shannon@epa.gov>
Subject: RE: PBS Guidance - One last look before I send to Prasad in FEAD

Russ,

I am fine with how you addressed Charlotte's comment. So, I think you can send to FEAD, BUT

I have just one more thing to clarify based on our conversation on the bus yesterday, and what you added to the summary based on Charlotte's comment. I think you said that if a PBS is not a PGR, then it must be a soil amendment, or a plant inoculant, etc (one of the things FIFRA excludes), and that is what your language says that you added in blue based on Charlotte's comment.

My question is this: is there any PBS that you know of that is not a PGR, not a soil amendment, not a plant inoculant or anything else FIFRA excludes? Are there PBSs that do not fall within the exclusions under FIFRA but are not PGRs, too? IF there are, then the language we are adding based on Charlotte's comment is incorrect. Are there things (i.e., some PBSs) that enhance water use, nutrient uptake, etc, that cannot be called one of the exclusions?

Does my question make sense?

If the answer is that all PBS that are not PGRs are covered in the FIFRA exclusions, send on to FEAD. If there is yet a new category – non-PGR, non FIFRA excluded, then I think the language in BLUE needs to be tweaked.

Bob

From: Jones, Russell
Sent: Wednesday, October 24, 2018 12:05 PM
To: McNally, Robert <Mcnally.Robert@epa.gov>
Subject: PBS Guidance - One last look before I send to Prasad in FEAD

Bob:

I know that you said I could send it off with minor changes, but I would feel better if you looked at it one more time.

I added my own text for Charlotte about the exclusions in the Exec Summary on page 3 (see Mark-up Copy) and noted that we already discussed the exclusions in the last paragraph of the Background section (so no changes there).

I removed a word (Similarly) at the beginning of the second to the last paragraph in Background section, since it did not belong.

I accepted Erik Baptiste's very minor word changes (they won't show up in the mark up copy)

If its good to go I will send the Clean Copy to Prasad/.

Russ