Message

From: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Sent: 8/2/2019 8:48:39 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]
Subject: FW: Draft 24(c) Guidance Document
Attachments: SLN Document for Comment- djr -- 8-2-19.docx

Mike – here's some ideas and edits on this.

Also – as we discussed – the document probably needs some appropriate questions or discussion prompts that the public and states can actually respond to. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Davis, Kable
Sent: Friday, August 2, 2019 2:39 PM
To: Goodis, Michael <Goodis.Michael@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
Subject: Draft 24(c) Guidance Document

Hi Mike –

Please find attached the draft 24(c) guidance document that incorporates all of OGC's comments and includes some additional language they wanted regarding submitting comments to the docket. There are two outstanding questions that OGC would like clarification on from management.

Question 1
What exactly are we asking for comment for? See below for examples of why there is confusion. Michele thinks it is a management call and is requesting some clarification from Rick (Dan – please jump in if I'm saying something incorrect).

1. Language from EPA's online update: **EPA is now re-evaluating its approach to reviewing 24(c) registrations and the circumstances under which it will exercise its authority to disapprove those registrations.**
2. My original language in the document: Ex. 5 Deliberative Process (DP)

   Ex. 5 Deliberative Process (DP)
3. Current version of language in the document: **EPA is requesting public comment on its desire to clarify the issues that have been raised under the current 24(c) policy that can also affect the registration review process. EPA's clarification will involve a discussion about the appropriateness of state lead agencies submitting 24(c) registrations that are more limited than the EPA-approved label.**

Question 2
Scott Garrison asked whether Alex wanted to revised the Qs and As? If so, he thinks I should include language regarding that.

Finally, I've established a docket and have written most of the Notice of Availability. I'll need to revise it based on how we decided to phrase what we are wanting comment on (that shouldn't take very long).

Thanks much,
Bo