Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 2/6/2017 2:44:20 PM
To: Groce, Stacey [groce.stacey@epa.gov]
Subject: FW: Sec 24(c)s for wind speed, etc.

Stacey – Here is the email I recommend placing in the jacket for our records on the Dicamba 24(c)s with respect to wind speed. Thanks.

From: Montague, Kathryn V.
Sent: Thursday, January 26, 2017 12:56 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: Sec 24(c)s for wind speed, etc.

Hi, Tawanda,

Here is what we discussed at the meeting earlier this week, and is essentially what I told NC verbally (via voicemail to Pat Jones):

Recently, the question has arisen from several states regarding whether or not EPA will consider additional state-level restrictions/requirements for certain herbicides via the SLN (24(c)) process. These include such things as requiring state-developed training programs for applicators and capping wind speed at 10 mph. EPA will consider 24(c)s to implement these types of restrictions; however, we encourage states to consider using their own regulatory authority to put these requirements in place, as 24(c)s can't be used for certain processes (such as reporting requirements) that some states have mentioned they would like to implement. Additionally, since the Section 3 label does not have any restrictions from use in the states in question, there could be enforceability issues with having more restrictive language on the 24(c) labels vs the Section 3 labels.

Thanks,
Kay