Message

From: Davis, Kable [Davis.Kable@epa.gov]
Sent: 5/6/2019 4:31:09 PM
To: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
CC: Davis, Donna [Davis.Donna@epa.gov]
Subject: RE: Tolfenpyrad and California
Attachments: Tolfenpyrad and California.docx

Hi Dan and Donna – Here is the write up for tolfenpyrad. Let me know if you have any questions.

From: Rosenblatt, Daniel
Sent: Monday, May 06, 2019 10:34 AM
To: Davis, Kable <Davis.Kable@epa.gov>
Cc: Davis, Donna <Davis.Donna@epa.gov>
Subject: FW: Tolfenpyrad and California

Hi Bo – Donna and I have a General with Rick tomorrow and this is yet another topic we could use some background on. So could you prepare a short write up or discussion on this?

Ex. 5 Deliberative Process (DP)

From: Keigwin, Richard
Sent: Monday, May 6, 2019 9:58 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>
Subject: Re: Tolfenpyrad and California

Sorry for all the inquiries this morning.

Ex. 5 Deliberative Process (DP) How long would that take if the registrant chose that option?

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

On May 2, 2019, at 2:52 PM, Goodis, Michael <Goodis.Michael@epa.gov> wrote:

> Just letting you know the latest in case you get another call. Since there seems to be a disagreement within OGC I asked Bob to look into it.
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** "Davis, Kable" <Davis.Kable@epa.gov>
> > **Date:** May 2, 2019 at 2:41:48 PM EDT
> > **To:** "Goodis, Michael" <Goodis.Michael@epa.gov>

Cc: "Rosenblatt, Daniel" <Rosenblatt.Dan@epa.gov>, "Davis, Donna" <Davis.Donna@epa.gov>, "Johnson, Marion" <Johnson.Marion@epa.gov>, "Walsh, Michael" <Walsh.Michael@epa.gov>, "Gebken, Richard" <Gebken.Richard@epa.gov>, "Rate, Debra" <Rate.Debra@epa.gov>, "Maignan, Tawanda" <Maignan.Tawanda@epa.gov>
Subject: RE: Tolfenpyrad and California

Hi Mike –

I just wanted to update you on the call IVB2 and MUERB had with OGC regarding tolfenpyrad. The use on citrus has not been approved yet in California and the state is wondering if they could submit a 24(c) registration that is more restrictive than the Section 3. We spoke with both Erin Koch and Scott Garrison. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you have any questions.
Bo

From: Johnson, Marion
Sent: Tuesday, April 30, 2019 2:06 PM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: Tolfenpyrad and California

Mike:

Here's some additional insight from what Debra found out from an earlier voicemail (4/29) response from Margaret Reiff in CA. As Bo indicates, we'll work with OGC to determine the legal possibilities.

Marion J.

Hi Marion,

I had a voicemail waiting for me this morning from Margaret Reiff. She gave a quick run down of the tolfenpyrad issue. It seems that the Section 3 registration in CA for tolfenpyrad is still in process as they are working on a CA only label for Citrus. They have concerns for ecotox and also aquatic concerns. The process for this registration is unlikely to meet the needs of the coming use season.

They are considering 24(c) options, but are unsure as the CA state label will be more restrictive. If they do try the 24(c) SLN for this citrus use, they would send a draft of the labeling to EPA before they issued it.

Marg is out today, but I can follow up with her on Tuesday as needed.

Debra

Marion J. Johnson, Jr.
Chief, Invertebrate-Vertebrate Branch 2
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
(703) 305-6788 (tel)
(703) 308-0029 (fax)
Johnson.marion@epa.gov
Visit: http://www/epa.gov/pesticides

From: Goodis, Michael
Sent: Tuesday, April 30, 2019 1:54 PM
To: Davis, Donna <Davis.Donna@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: Tolfenpyrad and California

Rick was contacted by CA citrus about whether there is an option for a 24c for tolfenpyrad since it is not registered in CA.
Apparently CDPR is still evaluating it and they need to have a public process for their registration decision – whatever it is.
I mentioned it to Bo yesterday and suggested he get with IVB2 and that OGC be consulted as well.
First let's see if this is an option or not and then report back to Rick who can then follow up with CA citrus.

Michael L. Goodis, P.E.
Director, Registration Division (RD)
Office of Pesticide Programs (OPP)

Phone 703-308-8157
Room S7623

From: Davis, Donna
Sent: Tuesday, April 30, 2019 7:32 AM
To: Johnson, Marion <Johnson.Marion@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Tolfenpyrad and California

OK, thanks Marion.

Mike, Did Rick raise a specific issue with you about Tolfenpyrad and CA yesterday?

From: Johnson, Marion
Sent: Friday, April 26, 2019 3:12 PM
To: Davis, Donna <Davis.Donna@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: Tolfenpyrad and California

Donna,

Other than a minor labeling inconsistency issue, which I mentioned briefly to Dan R today in passing, we are not aware of anything. Debra has made a call to her CPDR contact to get a "heads up" to see if there is anything brewing in CA, as well. At the moment, we haven't heard back from CA, but we'll keep you apprised if we do.

MJJ

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From: Davis, Donna
Sent: Friday, April 26, 2019 10:38 AM
To: Johnson, Marion <Johnson.Marion@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Subject: FW: Tolfenpyrad and California

Are you all aware of any issue related to Tolfenpyrad and California that might get senior leadership attention?