Message

From: Hathaway, Margaret [Hathaway.Margaret@epa.gov]
Sent: 2/9/2016 9:19:08 PM
To: Olinger, Christine [Olinger.Christine@epa.gov]; Rickard, Kristin [Rickard.Kristin@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]
CC: Mercado, Minerva [Mercado.Minerva@epa.gov]; Negussie, Meheret [Negussie.Meheret@epa.gov]; Rothman, Gabe [Rothman.Gabe@epa.gov]; Shamim, Mah [Shamim.Mah@epa.gov]; Sinclair, Geoffrey [Sinclair.Geoffrey@epa.gov]; Vaughan, Allen [Vaughan.Allen@epa.gov]; Baris, Reuben [Baris.Reuben@epa.gov]
Subject: FYI: Axiom (flufenacet) Oregon Special Local Need registration on Christmas trees
Attachments: LetterAxiomDFXmasTreeOR-150015.pdf; OR-150015AxiomXmasTreeLblNew.pdf; The 4 flufenacet forestry SLNs are all cancelled

Hi Everybody:
Some of you were part of a call this morning with the flufenacet registrants. Going into the call I had thought there were no aerial application uses for flufenacet because the forestry SLNs had all been cancelled (see my May 2015 email, attached). However, Bayer told us today that they do in fact have aerial forestry uses, and clarified that they are talking about OR150015 (see attached letter and label). OR's D of Agriculture signed off on this SLN in October 2015.

We will have to figure out how this will affect our risk assessment numbers.

Thanks,
Meg

From: Nancy Delaney [mailto:nancy.delaney@bayer.com]
Sent: Tuesday, October 27, 2015 3:10 PM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: BCSReg_Archive <esepamailbox@bayer.com>
Subject: FYI: Axiom (flufenacet) Oregon Special Local Need registration on Christmas trees

Hi Meg,

Please see the attached approval for the reinstated Special Local Need label for use of Axiom DF on Xmas trees in the State of Oregon. This use was questioned leading up to the publication of the draft Risk Assessments for registration review of flufenacet. I wanted to bring this to your attention as I am unsure how the EPA becomes informed.

Best Regards,
Nancy

Bayer CropScience
Science For A Better Life

Nancy Delaney
Federal Registrations
Research Triangle Park, North Carolina, USA
27709
Phone: +1 919-549-2080
Cell: Personal Matters / Ex. 6
e-mail: nancy.delaney@bayer.com
Web: www.bayercropscience.ca

Message

From: Green, Jamie [Green.Jamie@epa.gov]
Sent: 11/17/2017 4:34:33 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
CC: Hackett, Shawn [hackett.shawn@epa.gov]
Subject: Fwd: 24C SLN MO-180001 Engenia Herbicide
Attachments: Engenia_24c MO_2018.pdf; ATT00001.htm; Letter to EPA MO-180001.pdf; ATT00002.htm

Sent from my iPhone

Begin forwarded message:

From: "May, Melissa" <Melissa.May@mda.mo.gov>
Date: November 17, 2017 at 9:45:45 AM CST
To: "'Bradley, Kevin'" <bradleyke@missouri.edu>, "Miller, Lee" <millerger@missouri.edu>
Cc: "Wall, Dawn" <Dawn.Wall@mda.mo.gov>, "Slade, Darryl" <Darryl.Slade@mda.mo.gov>, "Bailey, Paul" <Paul.Bailey@mda.mo.gov>, "'Janet Hou'" <janet.hou@basf.com>
Subject: 24C SLN MO-180001 Engenia Herbicide

Good morning,

The Missouri Department of Agriculture has reviewed and accepted a Special Local Need Registration for Engenia™ Herbicide, EPA Reg. No. 7969-345, with additional restrictions for use on dicamba-tolerant soybeans and dicamba-tolerant cotton to reduce off-target movement. The Special Local Need Registration number assigned to this registration is MO-180001. The expiration date of Engenia™ Herbicide Special Local Need label is October 1, 2018.

Please see the attached label and letter for more information.

Regards,

Melissa May
Certification Program Coordinator
Bureau of Pesticide Control
Missouri Department of Agriculture
PO Box 630, Jefferson City, MO 65102
573-522-1637/ 573-751-0005 (fax)
melissa.may@mda.mo.gov
www.agriculture.mo.gov

Message

From: Javier, Julie [Javier.Julie@epa.gov]
Sent: 11/9/2017 5:04:02 PM
To: sharlyne.pyles@syngenta.com
CC: Anderson, Neil [Anderson.Neil@epa.gov]; Grable, Melissa [Grable.Melissa@epa.gov]; Zinn, Nicole [Zinn.Nicole@epa.gov]; Baris, Reuben [Baris.Reuben@epa.gov]; Jones, Ricardo [Jones.Ricardo@epa.gov]
Subject: Trifloxysulfuron-sodium Label Submission Due Date December 19, 2017
Attachments: Trifloxysulfuron-sodium_label_changes_signed_letter_20171108.pdf; List_of_Trifloxysulfuron-sodium_Products.doc; Interim_Registration_Review_Decision_for_22_SUs_20170627.pdf

Hi Sharlyne,

I'm the new Chemical Review Manager (CRM) for trifloxysulfuron-sodium. Nicole Zinn took on a new position in another branch in our Division.

You should have received an email from Margaret (Meg) Hathaway yesterday, November 8, regarding the label changes needed for the sulfonylurea herbicides in accordance with the June 2017 Interim Decision. This email is a follow-up to that and includes the following attachments:

- a memo similar to what Meg sent but has details specific to trifloxysulfuron-sodium,
- a list of trifloxysulfuron products, and
- the Interim Registration Review Decision for 22 Sulfonylurea (SU) Herbicides.

As stated in the memo, the amended labels are due to the Agency on December 19, 2017.

Please let me know if you have any questions.

Best regards,

Julie

Julie Rose N. Javier
Office of Pesticide Programs
Pesticide Re-Evaluation Division
Risk Management and Implementation Branch I
javier.julie@epa.gov
703-347-0790

Message

From: Scott, David E [scottde@purdue.edu]
Sent: 11/29/2017 12:53:22 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
CC: ewhite@purdue.edu; George Saxton [saxtong@purdue.edu]; ewhite@purdue.edu; Waltz, Robert D [rwaltz@purdue.edu]
Subject: RE: 24c
Attachments: 352_913_FEXAPAN_SLN_IN_1800XX (002).pdf; Engenia NVA 2017-04-385-0223 DT cotton soybean RUP 11-02-2017_24c IN (002).pdf; XtendiMax_24c_IN (draft).pdf

Reuben,

See attached. We are doing this because it is not entirely clear that our state law gives us the authority to require a specific kind of training that is outside of the state certification and licensing standards (which this is) without requiring that training by rule. Even if most folks think it is a good idea. Let me know if you have questions.

Dave Scott
Pesticide Administrator
Office of Indiana State Chemist
scottde@purdue.edu
765-494-1593

From: Baris, Reuben [mailto:Baris.Reuben@epa.gov]
Sent: Tuesday, November 28, 2017 4:27 PM
To: Scott, David E <scottde@purdue.edu>
Subject: 24c

What is the content of the 24c?

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Scott, David E [mailto:scottde@purdue.edu]
Sent: Tuesday, November 28, 2017 12:25 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: RE: Draft label interpretation guidance handout for Indiana dicamba training

Dave Scott
Pesticide Administrator
Office of Indiana State Chemist
scottde@purdue.edu
765-494-1593

From: Baris, Reuben [mailto:Baris.Reuben@epa.gov]
Sent: Tuesday, November 28, 2017 12:23 PM
To: Scott, David E <scottde@purdue.edu>
Subject: RE: Draft label interpretation guidance handout for Indiana dicamba training

Hi Dave,
This is a great guidance document. Thanks for sharing.

Is Indiana planning to issue 24c labels for the 2018 season? YES

Hope you're doing well otherwise. Personal Matters / Ex. 6 re you going to be here for SFIREG next week? YES
Reuben

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Scott, David E [mailto:scottde@purdue.edu]
Sent: Tuesday, November 28, 2017 9:47 AM
To: SCHMIDT, THOMAS MARK [AG/1005] <thomas.mark.schmidt@monsanto.com>; Judy Fersch (judy.fersch@basf.com) <judy.fersch@basf.com>
Cc: Whitford, Fred . <fwhitford@purdue.edu>; Janssen, Cheri L. <cjanssen@purdue.edu>; Baris, Reuben <Baris.Reuben@epa.gov>; George Saxton <saxtong@purdue.edu>; Waltz, Robert D <rwaltz@purdue.edu>; Bossaer, Gregory J <gbossaer@purdue.edu>
Subject: Draft label interpretation guidance handout for Indiana dicamba training

Tom & Judy,

Attached is a draft guidance document that we plan to use as part of the state-required dicamba training for Indiana applicators. If you have any comments or suggestions, we would be most interested. We would appreciate it if you could have any comments to me by C.O.B. today. Sorry for the ridiculously short turnaround time, but we are frantically scrambling to finalize our Indiana training package for the training season, which is already upon us.

When we have finalized our entire training package, we will be happy to share it with you. We anticipate that our training package may evolve over time, based on comments and questions raised during the training season. We will keep our most up-to-date materials posted to our Dicamba Herbicide Updates page http://www.oisc.purdue.edu/pesticide/dicamba.html.

Thanks.

Dave Scott
Pesticide Administrator
Office of Indiana State Chemist
scottde@purdue.edu
765-494-1593

Message

From: Kraft, Erik [Kraft.Erik@epa.gov]
Sent: 8/23/2017 11:54:59 AM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
CC: Baris, Reuben [Baris.Reuben@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]; Holloman, Rachel [Holloman.Rachel@epa.gov]
Subject: FW: Label Amendment request for Reg# 352-436
Attachments: higlighted Changes fin CLASSIC D-2024MSTR 082217.pdf; CLASSIC D-2024MSTR 082217.pdf

Kay,

Deliberative Process / Ex. 5

Thanks
Erik

From: AMBROSE, RICHARD J [mailto:Richard.J.Ambrose@dupont.com]
Sent: Tuesday, August 22, 2017 5:03 PM
To: Kaudy, Gene <kaudy.gene@epa.gov>
Cc: Kraft, Erik <Kraft.Erik@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>; Ag_Docbase <Ag-Docbase@dupont.com>
Subject: RE: Label Amendment request for Reg# 352-436

Hi Gene,

Thanks for your review. We made the changes you suggested with the exception of changing the references to glyphosate tolerant soybeans, glufosinate tolerant soybeans and sulfonylurea tolerant soybeans. Glyphosate tolerant soybeans is a good example. There are around six or seven hundred varieties in use at any one time. There are somewhere in the area of two thousand varieties in existence. There are new ones coming into the market on a regular basis. Most soybeans grown in the USA are glyphosate tolerant. There is no special formulation that is needed for any of these three examples in order to apply to these varieties.

We have seen were this may be important for Dicamba tolerant soybeans, these formulations were specifically developed for use on specific tolerant varieties. The tolerant dicamba soybeans and the specially formulated product are connected as a cropping system.

Personal Matters / Ex. 6

Have a great week and weekend,
Regards,

Rick

Richard J. Ambrose | DuPont Crop Protection – Hold Separate Business | U.S. Product Registration Manager | Stine Haskel Research Center
S300/423, 1090 Elkton Road, P.O. Box 30, Newark, Delaware 19714 | (302) 528-3764 Mobile | (302) 366-5185 Office

From: Kaudy, Gene [mailto:kaudy.gene@epa.gov]
Sent: Thursday, August 17, 2017 2:50 PM
To: AMBROSE, RICHARD J <Richard.J.Ambrose@dupont.com>
Cc: Kraft, Erik <Kraft.Erik@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>
Subject: [EXTERNAL] Label Amendment request for Reg# 352-436

Mr. Richard J. Ambrose

I have been assigned to review your product label for Reg# 352-436. I have noted and recommend several changes for this label. Please review and provide a clean and redline copy of the new labels with the advised changes.

Thank you,
Gene Kaudy
Environmental Protection Specialist
Environmental Protection Agency
OPP/RD/FHB

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Message

From: Bartow, Susan [Bartow.Susan@epa.gov]
Sent: 11/6/2017 3:54:25 PM
To: BIEBER, BONNIE J [Bonnie.J.Bieber@dupont.com]
CC: Britton, Cathryn [Britton.Cathryn@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Baris, Reuben [Baris.Reuben@epa.gov]; Hathaway, Margaret [Hathaway.Margaret@epa.gov]
Subject: Triflusulfuron-methyl label implementation
Attachments: Dupont SU label extension request response Nov 2017.pdf; 01_Sulfonylurea_SU_ID_6_27_2017_Signed.pdf; prn-2017-1-pesticide-resistance-management-labeling.pdf; prn-2017-2-herbicide-resistance-management.pdf; Triflusulfuron methyl products_110317.pdf; SU Label Implementation Letter - Labels due 11-19-17.pdf

Hi Bonnie,

Attached are 2 letters regarding the label implementation required from the sulfonylurea interim decision, the sulfonylurea interim decision, 2 PRNs, and a list of current triflusulfuron-methyl products. Please confirm via email that you have received this message and that you were able to open the attachments.

Please let me know if you have any questions.

Thanks,
Sue

~~~~~~~~~~~~~~~~~~~~

Susan Bartow
Chemical Review Manager
OPP/PRD/RMIB IV (7508P)
Phone: 703-603-0065
Email: bartow.susan@epa.gov

From: BIEBER, BONNIE J [mailto:Bonnie.J.Bieber@dupont.com]
Sent: Tuesday, October 03, 2017 1:50 PM
To: Bartow, Susan <Bartow.Susan@epa.gov>
Subject: RE: Current Contact Information for Triflusulfuron-methyl

Yes I am and the contact info is correct except change S300/431/ to S300/418

Bonnie J. Bieber
Registration Specialist
DuPont Crop Protection (Hold Separate Business)
Stine-Haskell Research Center
1090 Elkton Road, S300/418
Newark, DE 19711 USA
office: (302) 451-4525
cell: Personal Matters / Ex. 6
e-mail:bonnie.j.bieber@dupont.com
DUPONT
The miracles of science

From: Bartow, Susan [mailto:Bartow.Susan@epa.gov]
Sent: Tuesday, October 03, 2017 11:21 AM
~~~~~~~~~~~~~~~~~~~~

To: BIEBER, BONNIE J <Bonnie.J.Bieber@dupont.com>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: [EXTERNAL] Current Contact Information for Triflusulfuron-methyl

Hi Bonnie,

OPP is preparing a letter for all of the registrants regarding the process for submitting revised product labels with the mitigation identified in the Sulfonylurea Interim Decision.

I want to verify that you are still the contact for triflusulfuron-methyl and that your contact information below is still accurate.

Bonnie Bieber, Registration Specialist
DuPont Crop Protection
Stine-Haskell Research Center
1090 Elkton Road, S300/431
Newark, DE 19711 USA
office: (302) 451-4525
cell: Personal Matters / Ex. 6
e-mail:bonnie.j.bieber@dupont.com

Thanks in advance,

Sue

~~~~~~~~~~~~~~~~~~~~

Susan Bartow
Chemical Review Manager
OPP/PRD/RMIB IV (7508P)
Phone: 703-603-0065
Email: bartow.susan@epa.gov

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~~~~~~~~~~~~~~~~~~~~

Message

From: Meadows, Sarah [Meadows.Sarah@epa.gov]
Sent: 4/26/2017 2:22:15 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
Subject: FW: EPA Registration Number 352-887
Attachments: 352-887-20170425.pdf

Hi Reuben. Can you add a stamp to the sublabel (p.19 of the pdf) , per Rick's request?

Thanks,

Sarah

From: AMBROSE, RICHARD J [mailto:Richard.J.Ambrose@dupont.com]
Sent: Wednesday, April 26, 2017 10:19 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: EPA Registration Number 352-887

Hi Sarah,
I have received you email and can access the attachment. Thanks for your review.

Many of the states treat alternate brands of the same registration as anther registration, could you stamp accepted the DuPont™ Herbicide 800 SB part of the master label for us as well? States will ask us for it to be stamped.

Thanks,
Rick

From: Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]
Sent: Wednesday, April 26, 2017 9:09 AM
To: AMBROSE, RICHARD J <Richard.J.Ambrose@dupont.com>
Subject: EPA Registration Number 352-887

Hello Rick. I have attached an Agency letter and stamped label regarding the subject product. Please confirm receipt.

Thanks,

Sarah

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Message

From: Ondish, Mindy [ondish.mindy@epa.gov]
Sent: 5/19/2016 1:10:32 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
Subject: RE: Updated MT supplemental labels for Method 240SL and Perspective

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Those are my thoughts, I'd be curious to see what Dan thinks as well.

Mindy

From: Baris, Reuben
Sent: Wednesday, May 18, 2016 3:25 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: FW: Updated MT supplemental labels for Method 240SL and Perspective

Let me know what you think....

Also if the context is unclear, I may be able to clarify.

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Berry, Leonard [mailto:lberry@mt.gov]
Sent: Wednesday, May 18, 2016 10:43 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: FW: Updated MT supplemental labels for Method 240SL and Perspective

---

From: Annette Bloomberg [mailto:annette.bloomberg@bayer.com]
Sent: Tuesday, May 17, 2016 2:01 PM
To: Berry, Leonard
Cc: Steve Saunders; David Spak
Subject: Updated MT supplemental labels for Method 240SL and Perspective

Hi Leonard:
Thank you for all your help with the MT supplemental labels for Method 240SL and Perspective. I am glad this language addresses the concerns in your State.

I added "240SL" to the supplemental Method label because EPA registration number 432-1565 corresponds to Method 240SL (liquid formulation). I also updated the rates on the Method 240SL label (2.8 to7.5 fluid ounces). No changes were made to the Perspective label.

Looking forward to our discussion with Reuben. Thank you again.

Best regards,

Annette
Regulatory Affairs

Bayer

Science For A Better Life

Bayer CropScience LP
BCS-NA-RA
Research Triangle Park,
Tel: +1 919 549 2608
Personal Phone / Ex. 6
Fax:
E-mail: annette.bloomberg@bayer.com
Web: http://www.bayer.com

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Message

From: Ondish, Mindy [ondish.mindy@epa.gov]
Sent: 10/18/2018 2:26:00 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
Subject: FW: Question related to Gramoxone SL 2.0 requested changes
Attachments: 000100-01431.20170329G.GRAMOXONE_SL_2.0-AMEND-MAR2017.pdf; 000100-01431.20170329G.GRAMOXONE_SL_2.0-AMEND-MAR2017-HI.PDF; 000100-01431.20170329C-GRAMOXONE_SL-2.0-AMEND-SUP-MAR2017.pdf; 000100-01431.20170329C-GRAMOXONE_SL-2.0-AMEND-SUP-MAR2017 HI.PDF

Hey Reuben,

There's a proposed supplemental label for the SLN incorporation for rope wick to peanuts. Since we're rolling this into the mitigation amendment, what expiration date should it be? I have all of the paraquat EP labels ready for you to stamp, so can we say October 31, 2021?

Mindy

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Thursday, October 11, 2018 9:54 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Good morning Mindy,

Please find the section 3 and supplemental labels with the indicated changes made. I have included clean and highlighted copy. I have also summarized the changes below.

- Changed 2 applications to 1
- Changed solutions to solution.
- Changed "Note: Control of large weeds in enhanced if application is made in late afternoon or early evening." to ""Note: Control of large weeds is enhanced if application is made in late afternoon or early evening."
- Changed Do not exceed 0.5 lb ai/A (1 qt/A) total for the entire growing season from all applications on this or any other supplemental or Section 3 Federal label for peanut to DO NOT exceed 0.5 lb ai/A/year of paraquat-containing products for all combined uses.

Hope all is well and please let me know if you need anything else on these.

With Kind Regards,

Monty

From: Dixon Monty USGR
Sent: Wednesday, October 10, 2018 8:19 AM
To: 'Ondish, Mindy' <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

Thanks for message and I can certainly appreciate how busy you must be. I will have my label specialist make these changes and will send back to you quickly.

Hope you have a great day,

Monty

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Tuesday, October 9, 2018 12:06 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Monty,

Sorry it took me a while to get back to you on this. Had to put paraquat aside to tackle some PRIA actions. Please see attached for comments.

Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Wednesday, September 26, 2018 1:41 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

Please find the revised Gramoxone SL 2.0 labels that match the Parazone label for consistency of use patterns for the peanut wiper wick control of Palmer Amaranth. This change to the peanut wiper wick on the section 3 label is on page 52. With respect to the mixing rates being different, this would be likely due to the Parazone product having a higher concentration of paraquat necessitating the Parazone the label rates having to be adjusted to match the rates the Gramoxone SL 24Cs we had at that time. I have put together a table that demonstrates that despite the mixing volume ratios being different, the actual use rates are the same with respect to amount of paraquat being applied per acre/application.

I will be happy to provide any additional information or edits that would be necessary. Thank you for all of your work on this project. I know this label has had many edit cycles due to the need to get the language correct and now this edit. I appreciate how busy you are and thank you for your time in working on this.

With Kindest Regards,

Monty

Description	Parazone	Gramoxone
Paraquat concentration formulated product (lb/gal)	3	2
Dilution for wiper wick (parts formulation: parts of water)	1:2	1:1
Dilution % of formulated product in water	33%	50%
Amount of paraquat per gallon diluted (lb/gal)	0.99	1
Maximum applied per acre expressed as volume of mixture (pt/A)	0.67	1
Maximum applied per acre (lb ai/A)	0.25	0.25
Total Maximum Applied for all paraquat to peanuts (lb ai/A)	0.5	0.5

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Personal Phone / Ex. 6

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Tuesday, September 25, 2018 1:58 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Monty,

It should only reflect the approved SLNs. If the use directions across the SLNs are the same, then you could just add a sentence for GA for the additional weed. It would be best to match it to the Parazone label for consistency, but I also noticed that their mixture v/v rate is different than Gramoxone's.

Mindy

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Tuesday, September 25, 2018 1:21 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

I am embarrassed, you are right I sent the supplemental label. I had looked it at the same time as I was looking at the SLN and copied the wrong file. I apologize. Here is the AR SLN.

I will ask my label specialist to revise the labels to reflect the use directions on the SLN. One follow up question, since the current GA SLN includes Florida Beggarweed, is acceptable to allow this or should our label only have the Palmer Amaranth as is the case with rest of the SLNs and also the parazone label.

Thanks
Monty

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Tuesday, September 25, 2018 1:07 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Monty,

Was that the AR SLN? It looked like a supplemental label. Can you resend?

Since we are rolling in SLNs, it should be nearly identical to the existing SLN use directions. Please revise.

Mindy

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Tuesday, September 25, 2018 9:28 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Good Morning Mindy,

Below please find a list of the Gramoxone SL 2.0 SLNs for suppression of Palmer Amaranth in peanut and a courtesy copy of the Arkansas SLN as a representative sample. We will cancel the SLNs for this use as requested but we don't typically cancel SLNs until after we receive Agency approval that they were added to the Section 3 label and supplemental label so we can use the supplemental label until the new Section 3 labels are produced and on containers.

As shown in the table from our State Regulatory team below, all of our 24Cs are specific for use on Palmer Amaranth with the exception of Georgia which also includes Florida Beggarweed. As you indicate, the submitted label did not include this specificity. When the first 24c registrations were approved for this use, they allowed Gramoxone SL 2.0 to be applied through recirculating rope wick or carpet roller equipment for suppression or control of glyphosate-resistant Palmer Amaranth or to prevent seed production. This use would however be effective for other weed species that would be contacted with the wiper/rope/carpet. For this use pattern, the edible portion "peanuts" would be below ground and no residues would be expected in the peanuts due to the very strong soil binding characteristics of paraquat that prevent any soil movement. If however it is needed, we will provide revised label that add the specificity that this use is only for Suppression and/or Control of Palmer Amaranth in Peanut. Please advise.

Thanks and With Kind Regards,

Monty

Gramoxone SL 2.0	100-1431	AL-120003	For Suppression and/or Control of Palmer Amaranth in Peanut
Gramoxone SL 2.0	100-1431	AR-120005	For Suppression and/or Control of Palmer Amaranth in Peanut
Gramoxone SL 2.0	100-1431	FL-120004	For Suppression and/or control Palmer Amaranth in Peanut
Gramoxone SL 2.0	100-1431	GA-120004	For Suppression and/or Control of Palmer Amaranth and Florida Beggarweed in Peanut
Gramoxone SL 2.0	100-1431	MS-120007	For Suppression and/or control of Palmer Amaranth in Peanut
Gramoxone SL 2.0	100-1431	NC-120004	For Suppression and/or Control of Palmer Amaranth in Peanut
Gramoxone SL 2.0	100-1431	SC-120003	For Suppression and/or Control of Palmer Amaranth in Peanut

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Monday, September 24, 2018 8:12 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Monty,

You will need to cancel all applicable 24(c)s for this use in order for us to add it onto the Section 3 label. Can you provide a list of the current 24(c)s that have this use with the SLN IDs? Also, the use is more defined on Parazone 3SL's label vs. what you are proposing, with theirs stating that it's for suppression of palmer amaranth. I have not looked at the 24(c) labels, but are you proposing to amend from what's currently on the 24(c) labels?

Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Tuesday, September 04, 2018 12:04 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy

I hope you are well and had a nice Labor Day weekend. As a brief follow up to my voice mail last week, I would like to see if it is possible to replace the Gramoxone SL 2.0 label for this pending amendment sent on Aug 29 with the enclosed revision. The reason for this revision is that there is a 24C label for use of Gramoxone SL 2.0 in Georgia using carpet roller/wiper wick application equipment that expires this year. This use pattern provided needed control of Palmer Amaranth in peanuts. This use pattern is on the Section 3 label for another paraquat product (Parazone 3SL Herbicide EPA Reg. No. 5481-615) and as such, would be no longer allowed for renewal as 24C in Georgia. The difference between the enclosed revised version of the pending Gramoxone label and the one sent to you on August 29th is the addition of this use pattern which will subsequently replace the existing 24Cs in AL, AR, FL, GA, MS, NC and SC.

I have enclosed three files for your consideration:

- Revised versions of the label sent August 29, 2018
  - Clean version
  - Highlighted version with changes in blue
    - 24C Peanut Wiperwick/Carpet roller Uses added on page 52
- Supplemental label with the former 24C peanut uses

Thank you for your time in considering this request.

With Kind Regards,

Monty

From: Dixon Monty USGR
Sent: Wednesday, August 29, 2018 6:20 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

Hope you are well. Please find a clean and highlighted label updating the pending Gramoxone SL 2.0 label as in accordance with your email of 8/15. The changes in this version have been highlighted in blue highlights . A couple of notes: we have chosen the "Never Use" option below for consistency. Also in reviewing this label, we noticed a typo on page 62 in the Taniers (Puerto Rico Only) section that listed both 3 and 2 as the maximum number of applications per year. We have deleted the 2 as this is typographical error and should not have been listed.

Please let me know if you need any other edits or if I can provide any further assistance.

With Kindest Regards,
Monty

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Monday, August 27, 2018 9:14 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Monty,

We want to keep the mitigation statements as-is, so keep the "NEVER USE" on the front panel but use "DO NOT USE" for the others. Or you can change all to "NEVER USE" if you want to be consistent.

The preferred dust/mist statement is "NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air-purifying respirator with an HE filter with NIOSH approval number prefix TC-21C." What you are proposing would exclude the HE filter, which is more protective than the particulate filters.

Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Monday, August 20, 2018 4:05 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

We are close to shooting these back to you. I wanted to ensure you are ok with the proposed change/translation.

The label comments requested the change in yellow highlight only on page 8. I noticed the original statement is also on the front panel, bullet #6. I assume we should make the change there as well and will do so unless you indicate otherwise.

Location	Current Statement (English)	Current Translation on Label	Requested change	Proposed New Statement
Label page 8 And also on the front panel 6th bullet (page 4)	**NEVER USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS,**	**NUNCA USE ESTE PRODUCTO EN ÁREAS RESIDENCIALES O PÚBLICAS (COMO HOGARES,**	**DO NOT USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS,**	**~~NUNCA~~ NO USE ESTE PRODUCTO EN ÁREAS RESIDENCIALES O PÚBLICAS (COMO HOGARES,**

	RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS).	**JARDINES, ESCUELAS, PARQUES RECREATIVOS, CAMPOS DE GOLF O SALONES DE JUEGOS).**	**RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS).**	**JARDINES, ESCUELAS, PARQUES RECREATIVOS, CAMPOS DE GOLF O SALONES DE JUEGOS).**

The second change relates to the change in respirator language. It is straight forward as to what is needed on the label since not translated on the label. The "and a Dust/Mist NIOSH-approved respirator with any N, R, P, or HE filter." is also repeated on the counter card (supplemental materials) which does includes translation. The current statement and proposed translation for the counter card is listed below. Please confirm if this is acceptable.

Location	Current Statement (English)	Current Translation on Label	Requested change	Proposed New Statement
The Supplemental materials: the Counter Card	"and a Dust/Mist NIOSH-approved respirator with any N, R, P, or HE filter."	y un respirador aprobado por NIOSH para polvo/niebla con cualquier filtro N, R, P o HE.	Wear a NIOSH approved particulate filtering facepiece respirator with any N, R, of P filter.	Use un respirador facial con filtro de partículas aprobado por NIOSH con cualquier filtro N, R o P.

Thanks and with kind regards,

Monty

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 9/21/2018 7:12:18 PM
To: Ondish, Mindy [ondish.mindy@epa.gov]
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Deliberative Process / Ex. 5

How'd I do on this one? Happy to discuss if you disagree for any reason.

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Ondish, Mindy
Sent: Friday, September 21, 2018 2:48 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: FW: Question related to Gramoxone SL 2.0 requested changes

Reuben, I haven't dealt with 24c in a while so I can't remember the process, which has probably changed a few times by now.

Deliberative Process / Ex. 5

Mindy

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Tuesday, September 04, 2018 12:04 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy

I hope you are well and had a nice Labor Day weekend. As a brief follow up to my voice mail last week, I would like to see if it is possible to replace the Gramoxone SL 2.0 label for this pending amendment sent on Aug 29 with the enclosed revision. The reason for this revision is that there is a 24C label for use of Gramoxone SL 2.0 in Georgia using carpet roller/wiper wick application equipment that expires this year. This use pattern provided needed control of Palmer Amaranth in peanuts. This use pattern is on the Section 3 label for another paraquat product (Parazone 3SL Herbicide

EPA Reg. No. 5481-615) and as such, would be no longer allowed for renewal as 24C in Georgia. The difference between the enclosed revised version of the pending Gramoxone label and the one sent to you on August 29th is the addition of this use pattern which will subsequently replace the existing 24Cs in AL, AR, FL, GA, MS, NC and SC.

I have enclosed three files for your consideration:

- Revised versions of the label sent August 29, 2018
  - Clean version
  - Highlighted version with changes in blue
    - 24C Peanut Wiperwick/Carpet roller Uses added on page 52
- Supplemental label with the former 24C peanut uses

Thank you for your time in considering this request.

With Kind Regards,

Monty

From: Dixon Monty USGR
Sent: Wednesday, August 29, 2018 6:20 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

Hope you are well. Please find a clean and highlighted label updating the pending Gramoxone SL 2.0 label as in accordance with your email of 8/15. The changes in this version have been highlighted in blue highlights . A couple of notes: we have chosen the "Never Use" option below for consistency. Also in reviewing this label, we noticed a typo on page 62 in the Taniers (Puerto Rico Only) section that listed both 3 and 2 as the maximum number of applications per year. We have deleted the 2 as this is typographical error and should not have been listed.

Please let me know if you need any other edits or if I can provide any further assistance.

With Kindest Regards,
Monty

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Monday, August 27, 2018 9:14 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Question related to Gramoxone SL 2.0 requested changes

Monty,

We want to keep the mitigation statements as-is, so keep the "NEVER USE" on the front panel but use "DO NOT USE" for the others. Or you can change all to "NEVER USE" if you want to be consistent.

The preferred dust/mist statement is "NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air-purifying respirator with an HE filter with NIOSH approval number prefix TC-21C." What you are proposing would exclude the HE filter, which is more protective than the particulate filters.

Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division

U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Monday, August 20, 2018 4:05 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: Question related to Gramoxone SL 2.0 requested changes

Hi Mindy,

We are close to shooting these back to you. I wanted to ensure you are ok with the proposed change/translation.

The label comments requested the change in yellow highlight only on page 8. I noticed the original statement is also on the front panel, bullet #6. I assume we should make the change there as well and will do so unless you indicate otherwise.

Location	Current Statement (English)	Current Translation on Label	Requested change	Proposed New Statement
Label page 8 And also on the front panel 6th bullet (page 4)	**NEVER USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS, RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS).**	**NUNCA USE ESTE PRODUCTO EN ÁREAS RESIDENCIALES O PÚBLICAS (COMO HOGARES, JARDINES, ESCUELAS, PARQUES RECREATIVOS, CAMPOS DE GOLF O SALONES DE JUEGOS).**	**DO NOT USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS, RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS).**	**~~NUNCA~~ NO USE ESTE PRODUCTO EN ÁREAS RESIDENCIALES O PÚBLICAS (COMO HOGARES, JARDINES, ESCUELAS, PARQUES RECREATIVOS, CAMPOS DE GOLF O SALONES DE JUEGOS).**

The second change relates to the change in respirator language. It is straight forward as to what is needed on the label since not translated on the label. The "and a Dust/Mist NIOSH-approved respirator with any N, R, P, or HE filter." is also repeated on the counter card (supplemental materials) which does includes translation. The current statement and proposed translation for the counter card is listed below. Please confirm if this is acceptable.

Location	Current Statement (English)	Current Translation on Label	Requested change	Proposed New Statement
The Supplemental materials: the Counter Card	"and a Dust/Mist NIOSH-approved respirator with any N, R, P, or HE filter."	y un respirador aprobado por NIOSH para polvo/niebla con cualquier filtro N, R, P o HE.	Wear a NIOSH approved particulate filtering facepiece respirator with any N, R, of P filter.	Use un respirador facial con filtro de partículas aprobado por NIOSH con cualquier filtro N, R o P.

Thanks and with kind regards,

Monty

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 3/8/2018 2:50:27 PM
To: Rowland, Grant [Rowland.Grant@epa.gov]
Subject: FW: [Ext] FW: Sentrallas registration action update request
Attachments: 20170807A (Sentrallas).pdf; Label F D-2037 042817 (Sentrallas).pdf; Label F D-2037 042817 (Sentrallas-Highlighted).pdf; Label S DR-1819 010417-2 (Sentrallas).pdf; REF Label F SL-2000 050916 06-03-16 (Sentrallas).pdf

Team 23 action. I don't know the status, but I can help respond if you need.

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: E Bockrath [mailto:EDWARD.BOCKRATH@fmc.com]
Sent: Wednesday, March 07, 2018 2:43 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Cc: Bockrath, Edward T. (EDWARD.T.BOCKRATH@dupont.com) <edward.t.bockrath@dupont.com>; E Bockrath <EDWARD.BOCKRATH@fmc.com>
Subject: [Ext] FW: Sentrallas registration action update request

Hi Reuben,

Could you provide an update on the status of the review for this action? This amendment was submitted back in August 2017 and I have not received any Agency correspondences since the submission date. FedEx confirmed that the package was delivered on August 8, 2017 (Tracking # 779832334658).

Best regards,
Ed

Edward Bockrath
Product Registration Specialist, NAC Registration II
FMC Agricultural Solutions
edward.bockrath@fmc.com
(302) 366-6418

From: E Bockrath
Sent: Monday, February 26, 2018 12:44 PM
To: baris.reuben@epa.gov
Cc: E Bockrath <EDWARD.BOCKRATH@fmc.com>
Subject: FW: Sentrallas registration action update request

Hi Reuben,

Kay Montague provided your name as a contact person regarding my request for an update for the status of the fast track label amendment for "Sentrallas" that was submitted to the Agency in August 2017.

Let me know if you have any questions.

Best regards,
Ed

Edward Bockrath
Product Registration Specialist, NAC Registration II
FMC Agricultural Solutions
edward.bockrath@fmc.com
(302) 366-6418

From: E Bockrath
Sent: Monday, February 26, 2018 11:14 AM
To: Montague.kathryn@Epa.gov
Cc: E Bockrath <EDWARD.BOCKRATH@fmc.com>
Subject: Sentrallas registration action update request

Hi Ms. Montague,

On August 7, 2017 DuPont submitted a fast track label amendment for "DuPont™ Sentrallas® herbicide" (EPA. Reg. No. 352-897) to add triticale to the label, as well as incorporate general label improvements. To date, I have not received any feedback from the Agency in electronic or hard copy form regarding this amendment, so I am contacting you to check on the status of this registration action. For your reference, I have attached electronic copies of the submission package to this email.

Please note that on November 1, 2017 DuPont divested a number of assets to FMC Corporation - including registered products, certain facilities, and personnel. Included in that divestiture was "DuPont™ Sentrallas® herbicide" (EPA Reg. No. 352-897). Registration Transfer requests for this product registration were submitted to EPA in November 2017 and are pending approval. Additionally, I have now transitioned to FMC in the US Registration group.

Let me know if you have any questions or need additional information.

Thank you and kind regards,

Ed Bockrath

Edward Bockrath
Product Registration Specialist, NAC Registration II
FMC Agricultural Solutions
edward.bockrath@fmc.com
(302) 366-6418

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 11/17/2017 6:34:05 PM
To: Green, Jamie [Green.Jamie@epa.gov]
Subject: Re: 24C SLN MO-180001 Engenia Herbicide

Thanks Jamie.

Sent from my iPhone

On Nov 17, 2017, at 11:34 AM, Green, Jamie <Green.Jamie@epa.gov> wrote:

Sent from my iPhone

Begin forwarded message:

From: "May, Melissa" <Melissa.May@mda.mo.gov>
Date: November 17, 2017 at 9:45:45 AM CST
To: "'Bradley, Kevin'" <bradleyke@missouri.edu>, "Miller, Lee" <millerger@missouri.edu>
Cc: "Wall, Dawn" <Dawn.Wall@mda.mo.gov>, "Slade, Darryl" <Darryl.Slade@mda.mo.gov>, "Bailey, Paul" <Paul.Bailey@mda.mo.gov>, "'Janet Hou'" <janet.hou@basf.com>
Subject: 24C SLN MO-180001 Engenia Herbicide

Good morning,

The Missouri Department of Agriculture has reviewed and accepted a Special Local Need Registration for Engenia™ Herbicide, EPA Reg. No. 7969-345, with additional restrictions for use on dicamba-tolerant soybeans and dicamba-tolerant cotton to reduce off-target movement. The Special Local Need Registration number assigned to this registration is MO-180001. The expiration date of Engenia™ Herbicide Special Local Need label is October 1, 2018.

Please see the attached label and letter for more information.

Regards,

Melissa May
Certification Program Coordinator
Bureau of Pesticide Control
Missouri Department of Agriculture
PO Box 630, Jefferson City, MO 65102
573-522-1637/ 573-751-0005 (fax)
melissa.may@mda.mo.gov
www.agriculture.mo.gov

<Engenia_24c MO_2018.pdf>
<Letter to EPA MO-180001.pdf>

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 4/26/2017 2:33:50 PM
To: Meadows, Sarah [Meadows.Sarah@epa.gov]
Subject: RE: EPA Registration Number 352-887
Attachments: 352-887-20170425.pdf

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Meadows, Sarah
Sent: Wednesday, April 26, 2017 10:25 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: RE: EPA Registration Number 352-887

No supplemental, just a sublabel with a different brand name for the alternate packaging. Normally we don't stamp sublabels, but sometimes the registrant requests it, I guess.

From: Baris, Reuben
Sent: Wednesday, April 26, 2017 10:24 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: EPA Registration Number 352-887

Did I miss a supplemental or is he trying to add the supplemental (I have to admit I didn't look)?

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: Meadows, Sarah
Sent: Wednesday, April 26, 2017 10:22 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: FW: EPA Registration Number 352-887

Hi Reuben. Can you add a stamp to the sublabel (p.19 of the pdf) , per Rick's request?

Thanks,

Sarah

From: AMBROSE, RICHARD J [mailto:Richard.J.Ambrose@dupont.com]
Sent: Wednesday, April 26, 2017 10:19 AM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: EPA Registration Number 352-887

Hi Sarah,
I have received you email and can access the attachment. Thanks for your review.

Many of the states treat alternate brands of the same registration as anther registration, could you stamp accepted the DuPont™ Herbicide 800 SB part of the master label for us as well? States will ask us for it to be stamped.

Thanks,
Rick

From: Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]
Sent: Wednesday, April 26, 2017 9:09 AM
To: AMBROSE, RICHARD J <Richard.J.Ambrose@dupont.com>
Subject: EPA Registration Number 352-887

Hello Rick. I have attached an Agency letter and stamped label regarding the subject product. Please confirm receipt.

Thanks,

Sarah

This communication is for use by the intended recipient and contains information that may be Privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail,in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 6/2/2016 4:22:22 PM
To: Ondish, Mindy [ondish.mindy@epa.gov]
Subject: FW: Quizalofop benefits follow up
Attachments: Quizalofop Benefits Submission Enlist Corn 20160602.pdf; Pending Quizalofop action for use on Dow Enlist corn

I haven't looked at this, but I did respond to Connie on the 40 ft (that it'll be 40 ft not 30 because of chemical specific drift profiles).

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: HICKMAN, CONNIE [mailto:Constance.H.Hickman@dupont.com]
Sent: Thursday, June 02, 2016 11:36 AM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Cc: VUKICH, JACOB J <Jacob.J.Vukich@dupont.com>
Subject: RE: Quizalofop benefits follow up

Dear Reuben,

Attached please find a courtesy copy of our Benefits Document for Quizalofop. An official copy is being sent today via Fed Ex.

In addition, I attached an email I originally sent to Dan Kenny, dated May 6, 2016, regarding the proposed downwind buffer. I have not yet received a response regarding our proposal.

Please let me know if you need any additional information.

Best Regards,
Connie

Connie Hickman
U.S. Product Registration Manager
DuPont Crop Protection
Stine 300/426
Phone: 302-451-5710
Mobile: Personal Phone / Ex. 6
Fax: 302-355-4213

From: VUKICH, JACOB J
Sent: Tuesday, May 31, 2016 8:46 PM
To: Baris, Reuben <baris.reuben@epa.gov>
Cc: HICKMAN, CONNIE <Constance.H.Hickman@dupont.com>
Subject: Re: Quizalofop benefits follow up

Reuben,

We should have that to you by the end of this week.

Thanks for the follow-up.

Take care.

Jake

(Sent from my i-Pad)

On Tue, May 31, 2016 at 2:25 PM -0700, "Baris, Reuben" <Baris.Reuben@epa.gov> wrote:

Hi Jake,
I hope you had a nice long weekend. Just following up on the call we had a number of weeks ago about our request for a benefits analysis from you all for the quizalofop NU on enlist corn. Do you have an estimate when you'll have the submission ready?
Thank you.
reuben

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

Message

From: Inouye, John@CDPR [John.Inouye@cdpr.ca.gov]
Sent: 1/12/2016 7:56:08 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
CC: Reiff, Margaret@CDPR [Margaret.Reiff@cdpr.ca.gov]
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)
Attachments: 150008a.pdf

Tamica –

We just approved the label. You should be receiving it in the mail very shortly. I've attached a copy for you.

Sincerely,

John

From: Reiff, Margaret@CDPR
Sent: Tuesday, January 12, 2016 11:27 AM
To: Inouye, John@CDPR
Cc: Cain, Tamica (Cain.Tamica@epa.gov)
Subject: FW: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi John,

Shoot…I just found this in my spam. Weird since I've been receiving other emails from her? Would you please respond to Tamica if this hasn't already been taken care of. Many thanks!

Tamica, I'm so sorry for the delay in responding. My apologies. Also, John Inouye is the lead for our 24 program and he will be able to help you with this and other 24c issues. Please feel free to contact him directly in the future. I am always here to help in his absence, however.

Thank you!
Marg

Margaret Reiff
Environmental Program Manager I
Pesticide Registration Branch
Department of Pesticide Regulation
916.445.5977

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Tuesday, January 05, 2016 6:57 AM
To: Reiff, Margaret@CDPR
Cc: Laura Lee Whatley; Craig D Kleppe; Rate, Debra
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi Ms. Reiff,

I was emailing you to check the status of the revised labeling for SLN CA -150008. If the label is ready, please email me a copy so that we may review and update our records. Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Cain, Tamica
Sent: Friday, December 18, 2015 1:52 PM
To: 'Craig D Kleppe' <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Margaret.Reiff@cdpr.ca.gov
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

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Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica,

We submitted the revised SLN label to CA-DPR earlier this week.

Regards
Craig Kleppe
Product Registration Manager

Phone: +1 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: +1 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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BASF - We create chemistry

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Tamica,

Sounds good, I will change the 24c according to your suggestion. We will send the label off to CA-DPR early next week.

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Cc: Laura Lee Whatley <laura.whatley@basf.com>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi Mr. Kleppe,

Thank you for submitting the revised labeling. We would like to suggest the following revision in reference to the current supersede statement on the 24c label:

The timing of Prowl H2O application on this 24c label allows directions for use in addition to the container label regarding use on onion in California.

When the time comes to update the section 3 label, please refer to this statement regarding onions in California.

Thank you.

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United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Monday, December 07, 2015 1:19 PM
To: Rate, Debra <Rate.Debra@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>
Subject: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA

Dear Debra, Tamica,

As we had discussed last week, I have made some changes to the SLN label CA-150008. Please attached pdf for the suggested changes. Let me know if these changes sufficiently address your concerns. If so, BASF will submit back to CA-DPR to amend the SLN label. If you have further changes, please let me know. Thanks.

Regards
Craig Kleppe
Product Registration Manager

Phone: +1 919 547-2615 Mobile: +1-919-225-9261 Fax: +1 919 547-2850 E-Mail: craig.kleppe@basf.com
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Message

From: David Priebe [dpriebe@oda.state.or.us]
Sent: 3/1/2016 12:59:59 AM
To: Cain, Tamica [Cain.Tamica@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Fwd: Revised SLN OR-110004, Poast Herbicide/Irrigation&Drainage Ditches/Control of Glyphosate-Tolerant Creeping Bentgrass
Attachments: OR-110004PoastIrrigCanalBentgrssLbl2016.pdf; ATT00001.htm; LetterOR-110004Rev2016DLP.pdf; ATT00002.htm

Tamica: FYI.

I put a hard copy in the mail to Document Processing Desk.

David L. Priebe
State Registration Specialist
ODA - Pesticides Program
Phone: (503)986-4656
FAX: (503)986-4735
email: dpriebe@oda.state.or.us
****
We want to hear your story! Please take our
customer service survey.
****

Begin forwarded message:

From: David Priebe <dpriebe@oda.state.or.us>
Subject: Revised SLN OR-110004, Poast Herbicide/Irrigation&Drainage Ditches/Control of Glyphosate-Tolerant Creeping Bentgrass
Date: February 29, 2016 at 4:50:05 PM PST
To: Mary Fryczynski <mary.fryczynski@basf.com>, PINKHAM Jeff <jeff.pinkham@scotts.com>, jeff.lowe@scotts.com, Nancy K Osterbauer <nosterba@oda.state.or.us>, Helmuth Rogg <hrogg@oda.state.or.us>, MALLORY-SMITH Carol <Carol.Mallory-Smith@oregonstate.edu>, FELIX Joel <joel.felix@oregonstate.edu>, Brent S Nicolas <bnicolas@oda.state.or.us>, Sean Kretovics <skretovics@oda.state.or.us>, JOHANSEN _Erik <ejohansen@agr.wa.gov>, MILLER Ben <Ben.Miller@agri.idaho.gov>, Rose Kachadoorian <rkachadoorian@oda.state.or.us>, Catherine Hollinger Daniels <cdaniels@wsu.edu>
Cc: "Jones, Lenora J" <lenora.jones@wsu.edu>

Greetings:

Attached for your information is the revised label for the FIFRA Section 24(c) Special Local Need registration of Poast Herbicide, EPA Reg. No. 7969-58, for control of glyphosate-tolerant creeping bentgrass in dry irrigation canals and dry drainage ditches in Jefferson and Malheur counties in Oregon, EPA SLN No. OR-110004.

Please note: This version of the label replaces the version I sent you on 24 December 2015. EPA has requested that the table in Directions for Use be revised by changing column headings for maximum number of applications and maximum rate from "per season" to "per year". The transmittal letter to EPA is also attached.

Please let me know if you have any questions or concerns.

Sincerely yours,

David L. Priebe
State Registration Specialist
Pesticides Program
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301-2532
Phone: (503)986-4656
FAX: (503)986-4735
email: dpriebe@oda.state.or.us
****
We want to hear your story! Please take our
customer service survey.
****

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/12/2016 7:47:03 PM
To: Reiff, Margaret@CDPR [Margaret.Reiff@cdpr.ca.gov]; Inouye, John@CDPR [John.Inouye@cdpr.ca.gov]
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Ok, thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
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2777 S. Crystal Drive
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Thank you!
Marg

Margaret Reiff
Environmental Program Manager I
Pesticide Registration Branch
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916.445.5977

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To: Reiff, Margaret@CDPR
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From: Cain, Tamica
Sent: Friday, December 18, 2015 1:52 PM
To: 'Craig D Kleppe' <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
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Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica,

We submitted the revised SLN label to CA-DPR earlier this week.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Friday, December 11, 2015 9:07 AM

To: Cain, Tamica <Cain.Tamica@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica,

Sounds good, I will change the 24c according to your suggestion. We will send the label off to CA-DPR early next week.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

150 years
BASF - We create chemistry

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From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, December 10, 2015 4:26 PM
To: Craig D Kleppe <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi Mr. Kleppe,

Thank you for submitting the revised labeling. We would like to suggest the following revision in reference to the current supersede statement on the 24c label:

The timing of Prowl H2O application on this 24c label allows directions for use in addition to the container label regarding use on onion in California.

When the time comes to update the section 3 label, please refer to this statement regarding onions in California.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Monday, December 07, 2015 1:19 PM
To: Rate, Debra <Rate.Debra@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>

Cc: Laura Lee Whatley <laura.whatley@basf.com>
Subject: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA

Dear Debra, Tamica,

As we had discussed last week, I have made some changes to the SLN label CA-150008. Please attached pdf for the suggested changes. Let me know if these changes sufficiently address your concerns. If so, BASF will submit back to CA-DPR to amend the SLN label. If you have further changes, please let me know. Thanks.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex.5 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/12/2016 7:56:51 PM
To: Inouye, John@CDPR [John.Inouye@cdpr.ca.gov]
CC: Reiff, Margaret@CDPR [Margaret.Reiff@cdpr.ca.gov]
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Perfect! Thanks so much

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Tuesday, January 12, 2016 2:56 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Reiff, Margaret@CDPR <Margaret.Reiff@cdpr.ca.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica –

We just approved the label. You should be receiving it in the mail very shortly. I've attached a copy for you.

Sincerely,

John

From: Reiff, Margaret@CDPR
Sent: Tuesday, January 12, 2016 11:27 AM
To: Inouye, John@CDPR
Cc: Cain, Tamica (Cain.Tamica@epa.gov)
Subject: FW: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi John,

Shoot…I just found this in my spam. Weird since I've been receiving other emails from her? Would you please respond to Tamica if this hasn't already been taken care of. Many thanks!

Tamica, I'm so sorry for the delay in responding. My apologies. Also, John Inouye is the lead for our 24 program and he will be able to help you with this and other 24c issues. Please feel free to contact him directly in the future. I am always here to help in his absence, however.

Thank you!

Marg

Margaret Reiff
Environmental Program Manager I
Pesticide Registration Branch
Department of Pesticide Regulation
916.445.5977

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Tuesday, January 05, 2016 6:57 AM
To: Reiff, Margaret@CDPR
Cc: Laura Lee Whatley; Craig D Kleppe; Rate, Debra
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi Ms. Reiff,
I was emailing you to check the status of the revised labeling for SLN CA -150008. If the label is ready, please email me a copy so that we may review and update our records. Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Cain, Tamica
Sent: Friday, December 18, 2015 1:52 PM
To: 'Craig D Kleppe' <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Margaret.Reiff@cdpr.ca.gov
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Ok, thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Friday, December 18, 2015 1:35 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Margaret.Reiff@cdpr.ca.gov

Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica,

We submitted the revised SLN label to CA-DPR earlier this week.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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All contents of this e-mail and any attachments thereto are confidential unless explicitly specified otherwise in this e-mail. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Friday, December 18, 2015 1:14 PM
To: Craig D Kleppe <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Margaret.Reiff@cdpr.ca.gov
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hello,
I was checking the status of the revised SLN label for CA-150008. Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Friday, December 11, 2015 9:07 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Tamica,

Sounds good, I will change the 24c according to your suggestion. We will send the label off to CA-DPR early next week.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com

Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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To: Craig D Kleppe <craig.kleppe@basf.com>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA (SLN CA-150008)

Hi Mr. Kleppe,

Thank you for submitting the revised labeling. We would like to suggest the following revision in reference to the current supersede statement on the 24c label:

The timing of Prowl H2O application on this 24c label allows directions for use in addition to the container label regarding use on onion in California.

When the time comes to update the section 3 label, please refer to this statement regarding onions in California.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Monday, December 07, 2015 1:19 PM
To: Rate, Debra <Rate.Debra@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Laura Lee Whatley <laura.whatley@basf.com>
Subject: changes to Prowl H2O Herbicide (241-418) SLN label for delayed preemergence in onion for CA

Dear Debra, Tamica,

As we had discussed last week, I have made some changes to the SLN label CA-150008. Please attached pdf for the suggested changes. Let me know if these changes sufficiently address your concerns. If so, BASF will submit back to CA-DPR to amend the SLN label. If you have further changes, please let me know. Thanks.

Regards
Craig Kleppe
Product Registration Manager

Phone: 919 547-2615 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

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Message

From: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Sent: 5/22/2018 3:28:39 PM
To: Shahane, Ashok [Ashok.Shahane@freshfromflorida.com]; Kelly Friend [Kelly.Friend@freshfromflorida.com]; Daiker, Dave [Davis.Daiker@freshfromflorida.com]; Dubberly, Dale [Dale.Dubberly@freshfromflorida.com]; neil.richmond@freshfromflorida.com
CC: Clark, Charlie [Charlie.Clark@freshfromflorida.com]; Brown, Amy [Amy.Brown@freshfromflorida.com]; Beard, Phillip [Beard.Phillip@epa.gov]; Dominy, Randy [Dominy.Randy@epa.gov]; Bauman, Michael [bauman.michael@epa.gov]; 'Fishel,Frederick M' [weeddr@ufl.edu]; john.Hoblick@ffbf.org; Cain, Tamica [Cain.Tamica@epa.gov]; Zang Larry USGR [larry.zang@syngenta.com]; Dinnen Pat USGR [pat.dinnen@syngenta.com]; 'Morgan, Kevin' [Kevin.Morgan@ffbf.org]; jaime.jerrels@ffbf.org
Subject: RE: A notice of acceptance for SLN Manuscript (Unregistered, EPA SLN NO. FL-180003)

Hi Ashok --

Thanks for copying us on the electronic version. However, I do want to make sure that you are aware that OPP must also receive a hardcopy (paper) version of the label and supporting documentation, mailed to the OPP Front Desk staff. They are the ones who must begin the in-processing of SLN labels at our end. We are working towards making this process more electronically oriented, but that effort is just beginning.

Details on what to submit, mailing addresses, etc are available via the URL for 24(c)s below my 'signature' tex.

Please let me know if you have any questions.

Sincerely,

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Shahane, Ashok [mailto:Ashok.Shahane@freshfromflorida.com]
Sent: Tuesday, May 22, 2018 11:24 AM
To: Kelly Friend <Kelly.Friend@freshfromflorida.com>; Daiker, Dave <Davis.Daiker@freshfromflorida.com>; Dubberly, Dale <Dale.Dubberly@freshfromflorida.com>; neil.richmond@freshfromflorida.com
Cc: Clark, Charlie <Charlie.Clark@freshfromflorida.com>; Brown, Amy <Amy.Brown@freshfromflorida.com>; Beard, Phillip <Beard.Phillip@epa.gov>; Dominy, Randy <Dominy.Randy@epa.gov>; Bauman, Michael <bauman.michael@epa.gov>; 'Fishel,Frederick M' <weeddr@ufl.edu>; john.Hoblick@ffbf.org; Cain, Tamica <Cain.Tamica@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Zang Larry USGR <larry.zang@syngenta.com>; Dinnen Pat USGR <pat.dinnen@syngenta.com>; 'Morgan, Kevin' <Kevin.Morgan@ffbf.org>; jaime.jerrels@ffbf.org
Subject: A notice of acceptance for SLN Manuscript (Unregistered, EPA SLN NO. FL-180003)

Hi Everyone:

I am forwarding the notice of acceptance for Manuscript (pinoxaden) for your information and records. If you have any comments or questions or need any additional information, please let me know.

Thanks!

Ashok N. Shahane

Ashok N. Shahane, Ph.D.
Environmental Specialist III (Herbicide Registration Coordinator)
Pesticide Registration Review Section
Bureau of Scientific Evaluation and Technical Assistance
Division of Agricultural Environmental Services
Florida Department of Agriculture and Consumer Services

(850) 617-7916
(850) 617-7949 Fax
Ashok.shahane@freshfromflorida.com

Laboratory Bldg. 6
3125 Conner Blvd.
Tallahassee, Florida 32399-1650

www.FreshFromFlorida.com

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.

Message

From: Brown, Ronda (RR) [RRBrown2@dow.com]
Sent: 7/12/2018 5:27:07 PM
To: Sherman.Takatori@ISDA.IDAHO.GOV; Cain, Tamica [Cain.Tamica@epa.gov]
CC: Ouimette, David (D) [DGOuimette@dow.com]
Subject: SLN ID-180002 Quintec
Attachments: R136-078 Quintec Sec 24c ID-180002 Spray Interval Hops 12Jul18f.pdf

Sherman,

Please find attached the revised label per the request by Tamica Cain of the EPA. Please let me know if there is anything further or if we are good to release for use.

Thank you.

Ronda Brown
Registration Specialist
Bldg 308/2E-225
9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com

Corteva Agriscience™
Agriculture Division of DowDuPont™

Taking one breath, one step, one day at a time.

Message

From: Brown, Ronda (RR) [RRBrown2@dow.com]
Sent: 7/12/2018 4:32:41 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
CC: Sherman.Takatori@ISDA.IDAHO.GOV; Ouimette, David (D) [DGOuimette@dow.com]
Subject: SLN ID-180002 Quintec
Attachments: 20030930-3_NOR_EPA.pdf

Ms Cain,

I received your response to the inquiry regarding your request to add fungicide to the product name on this 24c label. Fungicide is considered by us to be a descriptor for Quintec. We list the type of pesticide in smaller print and **below** the product name on our Section 3 labels as reference/information for our customers. The product name, as registered, is Quintec. If you look at the Notice of Registration, the Product is shown to be registered with the name of "Quintec" only. See the attached copy of the NOR.

Thank you for your attention to this matter.

Ronda Brown
Registration Specialist
Bldg 308/2E-225
9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com

Corteva Agriscience™
Agriculture Division of DowDuPont™

Taking one breath, one step, one day at a time.

Message

From: Jack Peterson [jpeterson@azda.gov]
Sent: 4/25/2018 3:41:54 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum
Attachments: R396-187 Transform WD Sec 18 AZ Cotton 25April18d.pdf

Here is the revised cotton label which falls in line with last year. Sorry about that.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:52 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hi Jack –

Seems I wrote my last e-mail a bit too quickly – we just realized that the attachment you sent does not contain the use directions for these Section 18s and a supporting letter from the registrant. Can you please e-mail those as well?

Thanks and please let us know if you have any questions for us - Nik

---

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 11:31 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 7:19 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Thanks for the explanation – we'll use the ones you've e-mailed yesterday since you indicated that there were also some errors that were corrected.

For Section 18s, the electronic (e-mailed) versions are sufficient for us. At this time, SLN (24(c)) documents still just ***only*** be mailed in paper form to the OPP Front desk for appropriate in-processing to begin.

Regards, Nik

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 17, 2018 10:06 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

That is so weird as the packages we mailed in were returned to us. Therefore, we sent them again yesterday and I emailed them to you. There were some math errors in the first ones so one part was changed - 166.32(b)(1) in both packages. The other ones I emailed in were not acknowledged so I believed the only ones that count are the ones that we mail in – which unfortunately were returned due to a bad address.

Thank you for your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM
To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the

mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

Address for FedEx, UPS, DHL, Courier deliveries ***ONLY***

U.S. EPA Office of Pesticide Programs
Document Processing Desk (SLN)
U.S. Environmental Protection Agency
2777 Crystal Drive
Arlington, VA 22202

Address for U.S. Postal Service deliveries ***ONLY***
Document Processing Desk (SLN)
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

I hope this addresses your question sufficiently. If not, or if you have additional questions, please don't hesitate to contact me.

Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Jack Peterson [jpeterson@azda.gov]
Sent: 4/24/2018 7:19:16 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum
Attachments: R396-121 Transform WG Sec 18 AZ-XXXXXX Cotton 03Jan17d.pdf; Section 18 for cotton - LOS from DAS - 2018.pdf

Here is the letter of support and the label for the cotton section 18.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:52 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hi Jack –

Seems I wrote my last e-mail a bit too quickly – we just realized that the attachment you sent does not contain the use directions for these Section 18s and a supporting letter from the registrant. Can you please e-mail those as well?

Thanks and please let us know if you have any questions for us - Nik

---

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 11:31 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 7:19 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Thanks for the explanation – we'll use the ones you've e-mailed yesterday since you indicated that there were also some errors that were corrected.

For Section 18s, the electronic (e-mailed) versions are sufficient for us. At this time, SLN (24(c)) documents still just ***only*** be mailed in paper form to the OPP Front desk for appropriate in-processing to begin.

Regards, Nik

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 17, 2018 10:06 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

That is so weird as the packages we mailed in were returned to us. Therefore, we sent them again yesterday and I emailed them to you. There were some math errors in the first ones so one part was changed - 166.32(b)(1) in both packages. The other ones I emailed in were not acknowledged so I believed the only ones that count are the ones that we mail in – which unfortunately were returned due to a bad address.

Thank you for your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
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Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM
To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the

mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

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Document Processing Desk (SLN)
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2777 Crystal Drive
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Address for U.S. Postal Service deliveries ***ONLY***
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Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Jack Peterson [jpeterson@azda.gov]
Sent: 4/24/2018 3:30:35 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Peter Ellsworth [peterell@ag.arizona.edu]; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' [ayman@cals.arizona.edu]
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum
Attachments: 20180424082359476.pdf

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

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Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
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Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

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Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

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Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

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Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

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Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
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To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

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Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
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From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

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U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

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Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations

Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Polly Cross [polly.cross@wyo.gov]
Sent: 2/15/2018 7:53:07 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Fwd: Section 18 Amendment Request 17WY01 and 17WY02
Attachments: WDA Additional Use Request 17WY01 & 17WY02.pdf; Bayer Support Letter for Addition of Aerial Applicaitons to Section 18 432-1516.pdf; WY-EP Esplande 200SC Section 18 Medusahead and Vent WY w_aerial.pdf

Hi Tamica,

I didn't get a reply from you. I just wanted to make sure you got this!

Thank you!

---------- Forwarded message ----------
From: **Polly Cross** <polly.cross@wyo.gov>
Date: Mon, Jan 29, 2018 at 11:24 AM
Subject: Section 18 Amendment Request 17WY01 and 17WY02
To: "Cain, Tamica" <Cain.Tamica@epa.gov>, "Maignan, Tawanda" <maignan.tawanda@epa.gov>
Cc: John Roberts <john.roberts.ext@bayer.com>, Derek Sebastian <derek.sebastian@bayer.com>, Daniel Tekiela <drtekiela@gmail.com>, Doug Miyamoto <doug.miyamoto@wyo.gov>, Slade Franklin <slade.franklin@wyo.gov>, Wes Brown <wes.brown@wyo.gov>, Hank Uhden <hank.uhden@wyo.gov>, "Perreault.peg@epa.gov" <perreault.peg@epa.gov>

Please find attached an amendment to Wyoming Section 18's 17WY01 and 17WY02.

The amendment is for the a**dditional use of aerial applications for Indaziflam (Esplanade 200 SC) for the control of Medusahead and Ventenata on rangeland, pastures and CRP in Wyoming.**

Attached:

1. Wyoming Department of Agriculture Request Letter

2. Bayer, Support Letter, by John Roberts

3. Amended Section 18 Labeling

If you should require additional information or have questions or concerns, please do not hesitate to contact me.

--
Polly Cross
Assistant Manager, Inspection Supervisor

Technical Services
Wyoming Department of Agriculture
6607 Campstool Rd, Cheyenne, WY 82002
Phone - 307-777-6590
FAX - 307-777-1943

"E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties."

--

Polly Cross
Assistant Manager, Inspection Supervisor
Technical Services
Wyoming Department of Agriculture
6607 Campstool Rd, Cheyenne, WY 82002
Phone - 307-777-6590
FAX - 307-777-1943

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E-Mail to and from me, in connection with the transaction
of public business, is subject to the Wyoming Public Records
Act and may be disclosed to third parties.

Message

From: Polly Cross [polly.cross@wyo.gov]
Sent: 10/9/2017 7:31:29 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
CC: derek.sebastian@bayer.com; John Roberts [john.roberts.ext@bayer.com]; Personal Email / Ex. 6
Slade Franklin [slade.franklin@wyo.gov]; Wes Brown [wes.brown@wyo.gov]
Subject: Section 18 Amendments - 17WY01 & 17WY02
Attachments: Time Extension Request 17WY01 & 17WY02.docx; UPDATED EXPIRATION WY-EP Esplande 200SC Section 18 Medusahead and Vent WY.pdf

Hi Tamica,

Wyoming is requesting application time amendments to Wyoming Section 18's 17WY01 & 17WY02

Please find the following attachments:

WDA Request Letter
Updated labeling

If you should need additional information, please do not hesitate to let me know.

Thank you.

--
Polly Cross
Assistant Manager, Inspection Supervisor
Technical Services
Wyoming Department of Agriculture
6607 Campstool Rd, Cheyenne, WY 82002
Phone - 307-777-6590
FAX - 307-777-1943

"E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties."

E-Mail to and from me, in connection with the transaction
of public business, is subject to the Wyoming Public Records
Act and may be disclosed to third parties.

Message

From: Wade, Christopher (DDA) [Christopher.Wade@state.de.us]
Sent: 9/26/2016 3:13:37 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon
Attachments: DEDualMagnumWatermelonRevisedSLNLbl_09-26-16.pdf

Mrs. Cain,

Good morning. Please see below and the attached revised label. Thank you.

Chris Wade

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Monday, September 26, 2016 11:01 AM
To: Wade, Christopher (DDA)
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Dear Chris,

Attached is the revised Dual Magnum Herbicide DE-110001 SLN label with the adjuvant restriction language requested by EPA added. If you need anything else, please let me know.

Thank you,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Zang Larry USGR
Sent: Monday, September 26, 2016 9:36 AM
To: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

---

From: Wade, Christopher (DDA) [mailto:Christopher.Wade@state.de.us]
Sent: Friday, September 23, 2016 8:28 AM
To: Zang Larry USGR <larry.zang@syngenta.com>
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Larry,

Good morning1 Please see below. I received this request from EPA yesterday. Can you make this change to the label and send to me so I can forward to Mrs. Cain. Thank you.

Chris Wade

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, September 22, 2016 4:14 PM
To: Wade, Christopher (DDA)
Cc: Maignan, Tawanda
Subject: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Hi Mr. Wade,
I am in the process of reviewing SLN amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon. I am requesting that you please add the following bullet under Directions for Use and email me a copy of the revised label:

- **The risk of crop injury increases when adjuvants (e.g., non-ionic surfactants, crop oils, etc.), nitrogen sources (e.g., AMS, UAN), fertilizers or other pesticides are applied with Dual Magnum.**

If you have any questions, please do not hesitate to contact me.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Sent: 9/26/2016 2:08:52 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: FW: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)
Attachments: GADualMagnumMultiCropAmendedSLNLbl_09-26-16.pdf

Tamica,
Please see the attached label for SLN GA-090001 with the requested corrections.
Thanks,
Eric Olsen

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Monday, September 26, 2016 10:04 AM
To: Olsen, Eric
Subject: RE: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hello Eric,

Attached is the revised GA-090001 Dual Magnum SLN with the adjuvant restriction language added.

Thanks and regards,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, September 23, 2016 7:58 AM
To: Zang Larry USGR <larry.zang@syngenta.com>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: FW: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hi Larry,
I just received this request from EPA. Could you complete the requested addition to the label and return it to me?
Thanks,
Eric Olsen

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, September 22, 2016 1:53 PM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hi Mr. Olsen,
I am in the process of reviewing SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in broccoli, cabbage, cauliflower, Chinese cabbage, collards, kale, dry bulb onion, green onions, transplanted bell

peppers, beans, cantaloupe, watermelon, carrot, sweet potato, tomato, and summer squash (yellow and zucchini). I am requesting that you please add the following bullet under Directions for Use and email me a copy of the revised label:

- **The risk of crop injury increases when adjuvants (e.g., non-ionic surfactants, crop oils, etc.), nitrogen sources (e.g., AMS, UAN), fertilizers or other pesticides are applied with Dual Magnum.**

If you have any questions, please do not hesitate to contact me.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
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This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

'This email and any files transmitted with it are confidential and intended solely for the use of the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage by any virus transmitted by this email.'

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 4/17/2017 10:11:52 PM
To: 'cdaniels@wsu.edu' [cdaniels@wsu.edu]; 'Jones, Lenora J (lenora.jones@wsu.edu)' [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]
CC: 'aschreib@centurytel.net' [aschreib@centurytel.net]; 'Ben Miller (ben.miller@agri.idaho.gov)' [ben.miller@agri.idaho.gov]; 'David Priebe' [dpriebe@oda.state.or.us]; 'dwalsh@wsu.edu' [dwalsh@wsu.edu]; 'jherrera@yakama.com' [jherrera@yakama.com]; 'John Inouye (jinouye@cdpr.ca.gov)' [jinouye@cdpr.ca.gov]; Bauer, Elaine [EKBauer@dow.com]
Subject: Revised WA-110011 issued to Dow AgroSciences for use of Opensight Specialty Herbicide (EPA Reg. No. 62719-597) in forest plantations to control Scotch broom, thistles, hawkweed and other weeds.
Attachments: 62719-597_Opensight_20170417_WA-110011_62719_.pdf; 62719_Corres_20170417_WA-110011_EPA Ltr.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-110011 to Dow AgroSciences for Opensight Specialty Herbicide (EPA Reg. No. 62719-597) in forest plantations to control Scotch broom, thistles, hawkweed and other weeds.

Sincerely,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Algarin, Nestor (N) [NAlgarin@dow.com]
Sent: 4/17/2017 1:15:50 PM
To: sfoss@agr.wa.gov
CC: Cain, Tamica [Cain.Tamica@epa.gov]; Jones-Jefferson, Tami (T) [tjjonesjefferson@dow.com]; Bauer, Elaine [EKBauer@dow.com]
Subject: RE: Submit amended label for WA-110011 (Opensight® Specialty Herbicide) in response to EPA's review of this SLN

Good morning Steve,

I hope this communication finds you doing well.

The label is currently being reviewed by some of our stakeholders. I will forward the updated label to you as soon as is returned to me to be finalized.

I apologize for the delay regarding this matter.

Kind regards,

Nestor

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]
Sent: Friday, April 14, 2017 7:07 PM
To: Shears, Kristen (K); Jones-Jefferson, Tami (T); Algarin, Nestor (N)
Cc: Cain, Tamica
Subject: Submit amended label for WA-110011 (Opensight® Specialty Herbicide) in response to EPA's review of this SLN
Importance: High

Afternoon,

I am checking on the status of the revised label for WA-110011. EPA needs to update their file.

Please let us know.

Thank you.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Foss, Steve (AGR)
Sent: Monday, March 20, 2017 8:07 AM
To: 'Algarin, Nestor (N)' <NAlgarin@dow.com>
Subject: Submit amended label for WA-110011 (Opensight® Specialty Herbicide) in response to EPA's review of this SLN

Morning Nestor

Please submit an amended label for SLN WA-110011 (Opensight® Specialty Herbicide to control Scotch broom, thistles, hawkweed and other weeds in forest plantations) with the changes below in response to a review by EPA.

- Add the entire product name to the label: **Opensight® Specialty Herbicide**
- Amend the first sentence under DIRECTIONS FOR USE to clarify the timing of application
- Add a minimum application interval of 365 days for all application methods
- Revise the label to reflect the maximum single and annual application rates for DIRECTED SPRAY APPLICATIONS FOR CONIFER RELEASE. Use up to 3.3 oz per acre of Opensight and apply in a total spray volume of 10 to 30 gallons per acre
- Add the section:

Environmental Hazards

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has the properties and characteristics associated with chemicals detected in groundwater.The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

- Update the label id code

Thank you,
Steve

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 4/14/2017 11:06:46 PM
To: Kristen Shears (kshears@dow.com) [kshears@dow.com]; Jones-Jefferson, Tami (T) [tjjonesjefferson@dow.com]; Algarin, Nestor (N) [NAlgarin@dow.com]
CC: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: Submit amended label for WA-110011 (Opensight® Specialty Herbicide) in response to EPA's review of this SLN
Attachments: 62719-597_Opensight_20170313 draft_WA-110011.pdf

Importance: High

Afternoon,

I am checking on the status of the revised label for WA-110011. EPA needs to update their file.

Please let us know.

Thank you.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Foss, Steve (AGR)
Sent: Monday, March 20, 2017 8:07 AM
To: 'Algarin, Nestor (N)' <NAlgarin@dow.com>
Subject: Submit amended label for WA-110011 (Opensight® Specialty Herbicide) in response to EPA's review of this SLN

Morning Nestor

Please submit an amended label for SLN WA-110011 (Opensight® Specialty Herbicide to control Scotch broom, thistles, hawkweed and other weeds in forest plantations) with the changes below in response to a review by EPA.

- Add the entire product name to the label: **Opensight® Specialty Herbicide**
- Amend the first sentence under DIRECTIONS FOR USE to clarify the timing of application
- Add a minimum application interval of 365 days for all application methods
- Revise the label to reflect the maximum single and annual application rates for DIRECTED SPRAY APPLICATIONS FOR CONIFER RELEASE. Use up to 3.3 oz per acre of Opensight and apply in a total spray volume of 10 to 30 gallons per acre
- Add the section:

Environmental Hazards
Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.
This chemical has the properties and characteristics associated with chemicals detected in groundwater.The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

- Update the label id code

Thank you,

Steve

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Cofer, Tony [Tony.Cofer@agi.alabama.gov]
Sent: 5/31/2016 3:02:00 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: FW: SLN AL-160001 (Tribune) - Revised Version from Syngenta
Attachments: ALTribuneAqWeedsSLNLbl_052616.pdf

Sorry this took so long. Syngenta's rep was out of the country.

Tony

From: Zang Larry USGR [mailto:larry.zang@syngenta.com]
Sent: Thursday, May 26, 2016 2:49 PM
To: Cofer, Tony <Tony.Cofer@agi.alabama.gov>
Subject: RE: SLN AL-160001 (Tribune) - Revised Version from Syngenta

Hi Tony, here is the label with the changes EPA requested. We changed the version code too.

Please send me back a short note it's ok to release.

Thanks, Larry

From: Cofer, Tony [mailto:Tony.Cofer@agi.alabama.gov]
Sent: Wednesday, May 11, 2016 3:27 PM
To: Zang Larry USGR
Subject: FW: SLN AL-160001 (Tribune)

Larry,

You send me the label with the corrected EPA number but look at this other correction. Please forward me the corrected label and I will forward to EPA ASAP.

Tony

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Wednesday, May 11, 2016 2:07 PM
To: Cofer, Tony <Tony.Cofer@agi.alabama.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: SLN AL-160001 (Tribune)

Hi Mr. Cofer,

I am emailing to request that you submit a revised label for SLN AL-160001. The label we received was incomplete and had the incorrect EPA registration number. Please make the following revisions:

- EPA Reg. No. 100-1390

- EPA SLN No. AL-160001

- On page 2 of the SLN label, in the Application Rates For Submersed Weeds Chart ; please change surface area to surface "acre" as per page 16 of the Section 3 label

When you have revised the label, please email me a copy.

Thank you.

Tamica L. Cain, M.S.

Biologist

United States Environmental Protection Agency

Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Message

From: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Sent: 5/27/2016 1:06:45 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: RE: SLN GA-160001 (Tribune)
Attachments: SLN GA160001 Updated label.pdf

Apologies.Have a good weekend.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Friday, May 27, 2016 8:51 AM
To: Olsen, Eric
Cc: Dinnen Pat USGR
Subject: RE: SLN GA-160001 (Tribune)

Hi, thanks Eric
Can you please resend because the attachment wasn't there. Thanks

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, May 27, 2016 7:33 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: RE: SLN GA-160001 (Tribune)
Importance: High

Tamica,
Attached to this e-mail you will find the corrected Tribune SLN label GA160001.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Wednesday, May 11, 2016 3:10 PM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN GA-160001 (Tribune)

Hi Mr. Cofer,
I am emailing to request that you submit a revised label for SLN AL-160001. The label we received was incomplete and had the incorrect EPA registration number. Please make the following revisions:

- EPA SLN No. GA-160001
- On page 2 of the SLN label, in the Application Rates For Submersed Weeds Chart ; please change surface area to surface "acre" as per page 16 of the Section 3 label

When you have revised the label, please email me a copy.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Message

From: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Sent: 9/30/2016 5:59:39 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: FW: SLN Amendment GA-090001 Dual Magnum® Herbicide
Attachments: GADualMagnumMultiCropAmendedSLNLbl_09-30-16.pdf

Hi Tamica,
Will these changes suffice? Have a good weekend.
Eric

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Friday, September 30, 2016 1:05 PM
To: Olsen, Eric
Subject: RE: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Eric,

Attached is the revised with "Herbicide" added after the Dual Magnum name. I only put the ® mark the first time the name appears as that is what is required from a trademark perspective. If you think I should add the ® after the name each time, let me know and I will send another copy to submit.

Thanks,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, September 30, 2016 10:08 AM
To: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Cc: Zang Larry USGR <larry.zang@syngenta.com>
Subject: FW: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Pat,
Sorry to bother you with this again. Please see the additional corrections to SLN# GA-090001 requested by EPA in the e-mail below. Thanks for your help.
Eric Olsen
GDA Plant Protection

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Friday, September 30, 2016 9:02 AM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Mr. Olsen,

I am emailing you to request that you revise the SLN label for GA-090001. The current label has the product name as Dual Magnum. Please revise the label so that Dual Magnum® Herbicide is used throughout the entire label.

If you have any questions or concerns, please contact me via phone or email.

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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'This email and any files transmitted with it are confidential and intended solely for the use of the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage by any virus transmitted by this email.'

Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 4/8/2016 6:17:38 PM
To: Cain, Tamica [Cain.Tamica@epa.gov]
Subject: FW: Use Patterns for EPA SLN No. SC-160001. Reflex Herbicide (EPA Reg. No. 100-993)
Attachments: EPADPNo._D403953,D410795_07-18-13.pdf

Dear Tamica:

As discussed in our telephone conversation on Wednesday, April 8, 2016, following is an explanation to your questions regarding for Reflex Herbicide (EPA Reg. No. 100-993), EPA SLN No. SC-160001.

1. **Use Patterns on the SLN SC-160001 Do Not Match Use Patterns on the Reflex Section 3 Label**

   Use patterns for pumpkin, squash, and watermelon are listed on the Fomesafen Sodium Human Health Risk Assessment EPA memorandum, DP No. D403953, 410795 dated July 18, 2013, page 9 (attached). The use patterns for pumpkin, squash, and watermelon are direct seeded or transplant. On the SLN the use patterns are listed as Bare Ground Seeded and Bare Ground Transplant which is the same as direct seeded and transplant. The SLN also lists use in plastic mulch systems where the crop is transplanted following application under plastic mulch or over the top of plastic mulch and washed off.

2. **Crop Rotation Table on SLN SC-160001 Does Not Match Crop Rotation Table on the Reflex Section 3 Label**

   The crop rotation table on the Section 3 label reflects the use pattern for the registered uses on the Section 3 label. The 24(c) label expands in-season use on squash, pumpkin and watermelon, therefore, the rotational interval was reduced to zero for these crops. Based on the use patterns specific to this SLN for South Carolina a reduction in the plant back interval was warranted for cantaloupe, cucumber, pepper, and tomato. These plant back intervals were established to avoid any potential of crop injury. Also, cantaloupe, cucumber, pepper, and tomato do have established tolerances. The 10 month plant back interval for sorghum is the same as the Section 3 label (i.e. South Carolina is in Region 1 which has a 10 month plant back interval to sorghum).

Use patterns can be very specific on these crops and we would be happy to set up a conference call to answer any other questions you may have.

Thank you,
Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Sent: 7/18/2018 9:01:10 PM
To: Gill, Sonam [Gill.Sonam@epa.gov]
CC: Tualagi Gaoteote [tualagi.gaoteote@epa.as.gov]; Cain, Tamica [Cain.Tamica@epa.gov]
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Good afternoon Sonam,

As you are aware, 24(c)s are state/territory registrations. Therefore, the American Samoa Ag Department or other local government entity would need to review the package to ensure that it is in compliance with our regulations in the 40 CFR Part 162.

Once a decision is made to approve the request, then the areas designated for state use on the 8570-25 form would need to be filled in accordingly. The registrant would be contacted via letter of the decision and a request for the final label would be needed to include the SLN number (e.g., AS180001). A copy of the final SLN label, completed 8570-25 form and cover letter stating the SLN has been issued by the American Samoa, the local need (difference between the section 3 and 24(c)) and any supporting documentation must be sent within 10 days of issuance of the SLN to the following address via standard postal services:

U.S. Environmental Protection Agency
Document Processing Desk (SLN)
Office of Pesticide Program (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

I hope this helps. Feel free to contact me should you have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Gill, Sonam
Sent: Wednesday, July 18, 2018 4:07 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

Thank you for sending the SLN along. I noticed American Samoa did not sign off on the form attached. At this point how should I advise their Pesticide staff on approving the use of this SLN? Is it just a matter of signing this form, or is there more to it?

Sonam

From: Montague, Kathryn V.
Sent: Wednesday, July 18, 2018 11:11 AM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Thank you, Sonam. I am copying our SLN team here in OPP-RD.

Best Regards,
Kay

From: Gill, Sonam
Sent: Tuesday, July 17, 2018 5:04 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>
Subject: FW: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

American Samoa informed me of this SLN submitted to them for Milestone (EPA Reg. No. 62719-519.) I wanted to pass the information along. Please let me know if you have any questions/comments.

Sonam

From: Tualagi Gaoteote [mailto:tualagi.gaoteote@epa.as.gov]
Sent: Wednesday, July 11, 2018 6:54 PM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Watanabe, Allison <Watanabe.Allison@epa.gov>; William Sili <william.sili@epa.as.gov>; Fa'amamata Meredith <faamamata.meredith@epa.as.gov>
Subject: Fwd: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Sonam,

I'm forwarding the information I got from Mr. Bauer in regards to Mr. Baker's request for applying for a SLN (Section 24c) for the Milestone.

Please let me know if anything.

Thanks,
---------- Forwarded message ----------
From: **Bauer, Elaine** <EKBauer@dow.com>
Date: Wed, Jun 27, 2018 at 9:28 AM

Subject: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa
To: "tualagi.gaoteote@epa.as.gov" <tualagi.gaoteote@epa.as.gov>
Cc: "RODRIGUEZ, ANA CRISTINA" <ana-cristina.rodriguez@dupont.com>, "Bret, Brian (B)" <blbret@dow.com>, "Jones-Jefferson, Tami (T)" <tjjonesjefferson@dow.com>, "Galvin, Cathy (CL)" <CLGalvin@dow.com>

Dear Taulagi Gaoteote:

On June 11, 2018, I mailed to the American Samoa EPA a submission for a Section 24(c) label to fulfill a special local need for **Milestone for Control of Albizia in American Samoa**. We submitted the package in response to a request from Dr. David Bakke, US Forest Service, Pacific Southwest Region.

I'm writing to see if you have any questions or need anything more from Dow AgroSciences regarding the submission or the label.

Also, I want to provide you with the electronic copies of the documents that we mailed to you. See attached. The documents include:

1. Transmittal letter with justification

2. EPA form 8570-25 Application for/Notification of State Registration of a Pesticide to Meet a Special Local Need

3. Proposed Section 24(c) label for Milestone herbicide entitled "For Control of Albizia and Other Woody Species in Natural Areas" (Dow AgroSciences internal code R879-078)

4. Field efficacy data from Dr. James Leary, University of Hawaii at Manoa, Field Efficacy of Milestone (EPA reg. no. 62719-519) with the active ingredient aminopyralid as a metered, undiluted injection applied to high-priority invasive arboreal weed targets in the Pacific Basin. 6 pp.

5. Letter of support from USDA Forest Service, Pacific Southwest Region: Sherry Hazelhurst, Director of State and Private Forestry and Dr. David Bakke, Invasive Plants Program Manager and Regional Pesticide-use Specialist

Feel free to write or call me, whether it is with questions or with your approval of the SLN and 24(c) label. And please let me know if you need anything more. Many thanks.

Best regards,

Elaine

Elaine Bauer

Crop Protection Regulatory Specialist, US Regulatory Affairs

Corteva Agriscience™, Agriculture Division of DowDuPont™

Dow AgroSciences

Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268

Contact: 317-337-4073 or ekbauer@dow.com

--

Tualagi Gaoteote
Environmental Specialist II
AS-EPA
P.O.BOX PPA
Utulei Office Building
Pago Pago, AS, 96799
tualagi.gaoteote@epa.as.gov

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 7/16/2018 4:18:28 PM
To: Brown, Ronda (RR) [RRBrown2@dow.com]; Sherman.Takatori@ISDA.IDAHO.GOV
CC: Ouimette, David (D) [DGOuimette@dow.com]
Subject: RE: SLN ID-180002 Quintec

Thank you

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Brown, Ronda (RR) [mailto:RRBrown2@dow.com]
Sent: Thursday, July 12, 2018 1:27 PM
To: Sherman.Takatori@ISDA.IDAHO.GOV; Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Ouimette, David (D) <DGOuimette@dow.com>
Subject: SLN ID-180002 Quintec

Sherman,

Please find attached the revised label per the request by Tamica Cain of the EPA. Please let me know if there is anything further or if we are good to release for use.

Thank you.

Ronda Brown
Registration Specialist
Bldg 308/2E-225
9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com
Corteva Agriscience™
Agriculture Division of DowDuPont™

Taking one breath, one step, one day at a time.

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 7/12/2018 4:52:05 PM
To: Brown, Ronda (RR) [RRBrown2@dow.com]
Subject: RE: SLN ID-180002 Quintec

Thank you

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Brown, Ronda (RR) [mailto:RRBrown2@dow.com]
Sent: Thursday, July 12, 2018 12:44 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: SLN ID-180002 Quintec

Thank you. I will make the other revision and resubmit to the state, with a copy to you of the revised label.

Ronda Brown
Registration Specialist
Bldg 308/2E-225
9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com
Corteva Agriscience™
Agriculture Division of DowDuPont™

Taking one breath, one step, one day at a time.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, July 12, 2018 12:35 PM
To: Brown, Ronda (RR) <RRBrown2@dow.com>
Cc: Sherman.Takatori@ISDA.IDAHO.GOV; Ouimette, David (D) <DGOuimette@dow.com>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLN ID-180002 Quintec

Ok, thank you. please make all other revisions as requested. Thanks.

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive

Arlington, VA 22202
(703) 347-8110

From: Brown, Ronda (RR) [mailto:RRBrown2@dow.com]
Sent: Thursday, July 12, 2018 12:33 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Sherman.Takatori@ISDA.IDAHO.GOV; Ouimette, David (D) <DGOuimette@dow.com>
Subject: SLN ID-180002 Quintec

Ms Cain,

I received your response to the inquiry regarding your request to add fungicide to the product name on this 24c label. Fungicide is considered by us to be a descriptor for Quintec. We list the type of pesticide in smaller print and **below** the product name on our Section 3 labels as reference/information for our customers. The product name, as registered, is Quintec. If you look at the Notice of Registration, the Product is shown to be registered with the name of "Quintec" only. See the attached copy of the NOR.

Thank you for your attention to this matter.

Ronda Brown
Registration Specialist
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9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 4/26/2018 2:04:18 PM
To: Jack Peterson [jpeterson@azda.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Thank you

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Wednesday, April 25, 2018 11:42 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Here is the revised cotton label which falls in line with last year. Sorry about that.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:52 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hi Jack --

Seems I wrote my last e-mail a bit too quickly – we just realized that the attachment you sent does not contain the use directions for these Section 18s and a supporting letter from the registrant. Can you please e-mail those as well?

Thanks and please let us know if you have any questions for us - Nik

---

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 11:31 AM

To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

Jack Peterson
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From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 7:19 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Thanks for the explanation – we'll use the ones you've e-mailed yesterday since you indicated that there were also some errors that were corrected.

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Regards, Nik

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Thank you for your help.

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Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
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Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM
To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson

Associate Director, ESD
Arizona Department of Agriculture
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Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

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Document Processing Desk (SLN)
U.S. Environmental Protection Agency
2777 Crystal Drive
Arlington, VA 22202

*Address for U.S. Postal Service deliveries **ONLY***
Document Processing Desk (SLN)
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

I hope this addresses your question sufficiently. If not, or if you have additional questions, please don't hesitate to contact me.

Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
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Sent: 4/26/2018 1:46:47 PM
To: Jack Peterson [jpeterson@azda.gov]
CC: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Thanks. I will request revised use directions from you at a later time.

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 6:56 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Yes, that is what it should be. The letter from DOW recognizes the fact that the product is a good part of an IPM program and does help with whitefly, however, the use is exactly the same as last year. Do you need a new letter from DOW taking that out and stating tarnished plant bug?

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Tuesday, April 24, 2018 1:30 PM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hi Mr. Peterson,
I see that you added white flies as a pest to the section 18 use directions for sulfoxaflor on cotton. However, your cover letter states that the current use request is identical to last year. In the authorization from last year, the section 18 pest is identified as tarnished plant bug (Lygus spp.)
Please advise.
Thanks.

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs

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One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Sent: Tuesday, April 24, 2018 3:19 PM
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Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Here is the letter of support and the label for the cotton section 18.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:52 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; bibret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
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Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

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Arizona Department of Agriculture
1688 W Adams Street

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Sent: Tuesday, April 17, 2018 7:19 AM
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Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

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Regards, Nik

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Sent: Tuesday, April 17, 2018 10:06 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
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Thank you - Nik

Nikhil Mallampalli
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Minor Use and Emergency Response Branch
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Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
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Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
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Subject: RE: SLNs

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Thank you -

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Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Thanks. Please send the supporting information for sorghum when its available.

Thank you

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Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM
To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

*Address for FedEx, UPS, DHL, Courier deliveries **ONLY***

U.S. EPA Office of Pesticide Programs
Document Processing Desk (SLN)
U.S. Environmental Protection Agency
2777 Crystal Drive
Arlington, VA 22202

*Address for U.S. Postal Service deliveries **ONLY***
Document Processing Desk (SLN)
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

I hope this addresses your question sufficiently. If not, or if you have additional questions, please don't hesitate to contact me.

Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 4/23/2018 7:08:35 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Subject: FW: TIGR SLN - Proposed way forward
Attachments: Documents (seven pages) for TIGR SLN registration, May 30 2017.pdf

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Shahane, Ashok [mailto:Ashok.Shahane@freshfromflorida.com]
Sent: Tuesday, May 30, 2017 3:03 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Cain, Tamica <Cain.Tamica@epa.gov>; Clark, Charlie <Charlie.Clark@freshfromflorida.com>; Judy Fersch <judy.fersch@basf.com>; Mezin, Laurent <LaurentM@sepro.com>
Subject: FW: TIGR SLN - Proposed way forward

Hi Tawanda Maignan:

Today Charlie and I put together 7 pages of documents for TIGR SLN registration as per your instructions and they are attached for your review.

If you have any comments or questions or need any additional information, please us know.

Thanks!

Ashok N. Shahane

Ashok N. Shahane, Ph.D.
Environmental Specialist III (Herbicide Registration Coordinator)
Pesticide Registration Review Section
Bureau of Scientific Evaluation and Technical Assistance
Division of Agricultural Environmental Services
Florida Department of Agriculture and Consumer Services

(850) 617-7916
(850) 617-7949 Fax
Ashok.shahane@freshfromflorida.com

Laboratory Bldg. 6
3125 Conner Blvd.
Tallahassee, Florida 32399-1650

www.FreshFromFlorida.com

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Tuesday, May 23, 2017 9:40 AM
To: Mezin, Laurent <LaurentM@sepro.com>; Clark, Charlie <Charlie.Clark@freshfromflorida.com>; Shahane, Ashok <Ashok.Shahane@freshfromflorida.com>; Judy Fersch <judy.fersch@basf.com>
Cc: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: TIGR SLN - Proposed way forward

Laurent,
Thanks for sharing this message capturing the path forward. We look forward to resolving this action soon.
Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Mezin, Laurent [mailto:LaurentM@sepro.com]
Sent: Monday, May 22, 2017 3:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Clark, Charlie <Charlie.Clark@freshfromflorida.com>; Shahane, Ashok <Ashok.Shahane@freshfromflorida.com>; Judy Fersch <judy.fersch@basf.com>
Cc: Mezin, Laurent <LaurentM@sepro.com>
Subject: TIGR SLN - Proposed way forward

Dear all:

Following my call with Charlie and Ashok today, I had a conversation with Tawanda (EPA) to discuss my proposal to wrap up this SLN.

Tawanda agreed that the following would be acceptable:

- EPA form 8570-25, listing TIGR herbicide, with BASF's company information (as the main registrant)
- SLN label, listing TIGR, SLN No. FL-160001, with BASF's company information

BASF and SePRO will make sure FDACS has those documents to send to EPA.

This will enable EPA review. Assuming EPA approval, the Agency will notify FDACS that this SLN for BASF's TIGR is approved. SePRO's SLN label for the same (sub-registered – 7969-58-67690) product will fall under the same approval and SLN No., automatically.

Please let the group know if you have any questions or concerns.

Thank you all very much for your help. I appreciate your time and effort to get through this process.

Laurent

Laurent C. Mézin, Ph. D.
Regulatory and Government Affairs Leader

SePRO Corporation
11550 North Meridian Street, Suite 600 | Carmel, IN 46032 | www.sepro.com

(317) 580 8286 Office
LaurentM@sepro.com

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/30/2018 7:00:50 PM
To: Swartz, Christina [Swartz.Christina@epa.gov]; Doherty, Michael [doherty.michael@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Section 18 Amendment Request 17WY01 and 17WY02
Attachments: WDA Additional Use Request 17WY01 & 17WY02.pdf; Bayer Support Letter for Addition of Aerial Applicaitons to Section 18 432-1516.pdf; WY-EP Esplande 200SC Section 18 Medusahead and Vent WY w_aerial.pdf

Hello HED,
Wyoming has asked for an amendment to the emergency exemption for the use of indaziflam. They would like to add aerial applications to their use directions. Aerial applications are allowed on the section 3 label. However, Wyoming didn't ask for aerial use in their original emergency request. Do you need to evaluate this use pattern with the addition of the aerial use?
Thank you

Tamica L. Cain
United States Environmental Protection Agency
Office of Pesticide Programs
Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Polly Cross [mailto:polly.cross@wyo.gov]
Sent: Monday, January 29, 2018 1:25 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: John Roberts <john.roberts.ext@bayer.com>; Derek Sebastian <derek.sebastian@bayer.com>; Daniel Tekiela Personal Email / Ex. 6 Doug Miyamoto <doug.miyamoto@wyo.gov>; Slade Franklin <slade.franklin@wyo.gov>; Wes Brown <wes.brown@wyo.gov>; Hank Uhden <hank.uhden@wyo.gov>; Perreault, Peg <Perreault.Peg@epa.gov>
Subject: Section 18 Amendment Request 17WY01 and 17WY02

Please find attached an amendment to Wyoming Section 18's 17WY01 and 17WY02.

The amendment is for the a**dditional use of aerial applications for Indaziflam (Esplanade 200 SC) for the control of Medusahead and Ventenata on rangeland, pastures and CRP in Wyoming.**

Attached:

1. Wyoming Department of Agriculture Request Letter

2. Bayer, Support Letter, by John Roberts

3. Amended Section 18 Labeling

If you should require additional information or have questions or concerns, please do not hesitate to contact me.

--

Polly Cross
Assistant Manager, Inspection Supervisor
Technical Services
Wyoming Department of Agriculture
6607 Campstool Rd, Cheyenne, WY 82002
Phone - 307-777-6590
FAX - 307-777-1943

"E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties."

E-Mail to and from me, in connection with the transaction
of public business, is subject to the Wyoming Public Records
Act and may be disclosed to third parties.

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 4/18/2017 6:46:40 PM
To: Foss, Steve (AGR) [SFoss@agr.wa.gov]; 'cdaniels@wsu.edu' [cdaniels@wsu.edu]; 'Jones, Lenora J (lenora.jones@wsu.edu)' [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: 'aschreib@centurytel.net' [aschreib@centurytel.net]; 'Ben Miller (ben.miller@agri.idaho.gov)' [ben.miller@agri.idaho.gov]; 'David Priebe' [dpriebe@oda.state.or.us]; 'dwalsh@wsu.edu' [dwalsh@wsu.edu]; 'jherrera@yakama.com' [jherrera@yakama.com]; 'John Inouye (jinouye@cdpr.ca.gov)' [jinouye@cdpr.ca.gov]; Bauer, Elaine [EKBauer@dow.com]
Subject: RE: Revised WA-110011 issued to Dow AgroSciences for use of Opensight Specialty Herbicide (EPA Reg. No. 62719-597) in forest plantations to control Scotch broom, thistles, hawkweed and other weeds.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]
Sent: Monday, April 17, 2017 6:12 PM
To: 'cdaniels@wsu.edu' <cdaniels@wsu.edu>; 'Jones, Lenora J (lenora.jones@wsu.edu)' <lenora.jones@wsu.edu>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Cc: 'aschreib@centurytel.net' <aschreib@centurytel.net>; 'Ben Miller (ben.miller@agri.idaho.gov)' <ben.miller@agri.idaho.gov>; 'David Priebe' <dpriebe@oda.state.or.us>; 'dwalsh@wsu.edu' <dwalsh@wsu.edu>; 'jherrera@yakama.com' <jherrera@yakama.com>; 'John Inouye (jinouye@cdpr.ca.gov)' <jinouye@cdpr.ca.gov>; Bauer, Elaine <EKBauer@dow.com>
Subject: Revised WA-110011 issued to Dow AgroSciences for use of Opensight Specialty Herbicide (EPA Reg. No. 62719-597) in forest plantations to control Scotch broom, thistles, hawkweed and other weeds.

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-110011 to Dow AgroSciences for Opensight Specialty Herbicide (EPA Reg. No. 62719-597) in forest plantations to control Scotch broom, thistles, hawkweed and other weeds.

Sincerely,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 10/19/2016 7:05:55 PM
To: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Subject: RE: SLN Amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Wednesday, October 19, 2016 2:02 PM
To: christopher.wade@state.de.us
Cc: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: FW: SLN Amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus

Hello, re-send due to incorrect email address. Thanks, Pat.

From: Dinnen Pat USGR
Sent: Wednesday, October 19, 2016 2:00 PM
To: 'Wade, Christopher (DDA)' <Christopher.Wade@state.de.us>
Cc: cain.tamika@epa.gov
Subject: RE: SLN Amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus

Hi Chris,
Sorry for the delay in responding. Here is the revised SLN label with the adjuvant restriction language added.
Thanks,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Wade, Christopher (DDA) [mailto:Christopher.Wade@state.de.us]
Sent: Thursday, October 06, 2016 4:15 PM
To: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: FW: SLN Amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus

Pat,

Please see the email below from EPA, can you make this revision and send it back to me, you can also just copy the Tamica on the email if you would like since she made the request. That was we both receive the label at the same time. Thanks.

Chris

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, October 06, 2016 3:31 PM
To: Wade, Christopher (DDA)
Cc: Maignan, Tawanda
Subject: SLN Amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus

Hi Mr. Wade,
I am in the process of reviewing SLN amendment DE-040004, Dual Magnum® Herbicide (S-metolachlor), to control weeds in asparagus. I am requesting that you please add the following bullet under Directions for Use and email me a copy of the revised label:

- **The risk of crop injury increases when adjuvants (e.g., non-ionic surfactants, crop oils, etc.), nitrogen sources (e.g., AMS, UAN), fertilizers or other pesticides are applied with Dual Magnum.**

If you have any questions, please do not hesitate to contact me.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/6/2017 11:01:23 PM
To: Zang Larry USGR [larry.zang@syngenta.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Hi Larry,
Thank you for your email.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Zang Larry USGR [mailto:larry.zang@syngenta.com]
Sent: Friday, January 06, 2017 3:51 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Hi Tamica,

Following our telephone conversation this afternoon, attached is the most recent version of the EPA stamped Section 3 and supplemental label for Abound, EPA Reg. Number 100-1098, that adds the tobacco transplants in greenhouse use. Quadris Flowable Fungicide is an alternate brand name for Abound.

We just received the copy of the stamped supplemental label on Dec 28, 2016.

We will be cancelling the existing SLN's for this use in the next few weeks. These SLN's will also be marked as "cancelled" on the EPA Maintenance Fee Report due to EPA in a few weeks.

If you have any additional questions, please contact me.

Regards, Larry

Larry Zang
Senior Regulatory Product Manager
North America

Syngenta
410 Swing Road
Greensboro, NC 27409
USA

phone +1 336-632-2146
cell +336 870 0173
fax +1 336-632-2884

larry.zang@syngenta.com

From: Balan, Aswathy [mailto:Balan.Aswathy@epa.gov]
Sent: Wednesday, December 28, 2016 1:22 PM
To: Clark Adora USGR <adora.clark@syngenta.com>
Subject: Label amendment Reg# 100-1098

Hi Adora,

Please see attached updated stamped label which now includes the supplemental label as well.

Thanks,
Aswathy

Aswathy Balan, Biologist
Fungicide and Herbicide Branch
OCSPP/OPP/RD
Environmental Protection Agency
Ph: 703-347-0510

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/6/2017 9:47:11 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Ok, so there's nothing else I need to request, like re-mentioning PRIA?

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Maignan, Tawanda
Sent: Friday, January 06, 2017 4:04 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Tamica – This is great news. Thanks for following up!!

From: Cain, Tamica
Sent: Friday, January 06, 2017 3:55 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Zang Larry USGR [mailto:larry.zang@syngenta.com]
Sent: Friday, January 06, 2017 3:51 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Hi Tamica,

Following our telephone conversation this afternoon, attached is the most recent version of the EPA stamped Section 3 and supplemental label for Abound, EPA Reg. Number 100-1098, that adds the tobacco transplants in greenhouse use. Quadris Flowable Fungicide is an alternate brand name for Abound.

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If you have any additional questions, please contact me.

Regards, Larry

Larry Zang
Senior Regulatory Product Manager
North America

Syngenta
410 Swing Road
Greensboro, NC 27409
USA

phone +1 336-632-2146
cell +336 870 0173
fax +1 336-632-2884

larry.zang@syngenta.com
www.syngenta.com

From: Balan, Aswathy [mailto:Balan.Aswathy@epa.gov]
Sent: Wednesday, December 28, 2016 1:22 PM
To: Clark Adora USGR <adora.clark@syngenta.com>
Subject: Label amendment Reg# 100-1098

Hi Adora,

Please see attached updated stamped label which now includes the supplemental label as well.

Thanks,
Aswathy

Aswathy Balan, Biologist
Fungicide and Herbicide Branch
OCSPP/OPP/RD
Environmental Protection Agency
Ph: 703-347-0510

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 1/6/2017 8:54:36 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco
Attachments: removed.txt; 100-1098-20161107.pdf

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Zang Larry USGR [mailto:larry.zang@syngenta.com]
Sent: Friday, January 06, 2017 3:51 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: Your question on SLN;s for Quadris Flowable Fungicide for use on tobacco

Hi Tamica,

Following our telephone conversation this afternoon, attached is the most recent version of the EPA stamped Section 3 and supplemental label for Abound, EPA Reg. Number 100-1098, that adds the tobacco transplants in greenhouse use. Quadris Flowable Fungicide is an alternate brand name for Abound.

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If you have any additional questions, please contact me.

Regards, Larry

Larry Zang
Senior Regulatory Product Manager
North America

Syngenta
410 Swing Road
Greensboro, NC 27409
USA

phone +1 336-632-2146
cell +336 870 0173
fax +1 336-632-2884

larry.zang@syngenta.com
www.syngenta.com

From: Balan, Aswathy [mailto:Balan.Aswathy@epa.gov]
Sent: Wednesday, December 28, 2016 1:22 PM
To: Clark Adora USGR <adora.clark@syngenta.com>
Subject: Label amendment Reg# 100-1098

Hi Adora,

Please see attached updated stamped label which now includes the supplemental label as well.

Thanks,
Aswathy

Aswathy Balan, Biologist
Fungicide and Herbicide Branch
OCSPP/OPP/RD
Environmental Protection Agency
Ph: 703-347-0510

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 9/30/2016 6:52:34 PM
To: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Subject: RE: SLN Amendment GA-090001 Dual Magnum® Herbicide

This should be ok. Thank you. Have a great weekend

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, September 30, 2016 2:00 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: FW: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Tamica,
Will these changes suffice? Have a good weekend.
Eric

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Friday, September 30, 2016 1:05 PM
To: Olsen, Eric
Subject: RE: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Eric,

Attached is the revised with "Herbicide" added after the Dual Magnum name. I only put the ® mark the first time the name appears as that is what is required from a trademark perspective. If you think I should add the ® after the name each time, let me know and I will send another copy to submit.

Thanks,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, September 30, 2016 10:08 AM
To: Dinnen Pat USGR <pat.dinnen@syngenta.com>

Cc: Zang Larry USGR <larry.zang@syngenta.com>
Subject: FW: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Pat,
Sorry to bother you with this again. Please see the additional corrections to SLN# GA-090001 requested by EPA in the e-mail below. Thanks for your help.
Eric Olsen
GDA Plant Protection

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Friday, September 30, 2016 9:02 AM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN Amendment GA-090001 Dual Magnum® Herbicide

Hi Mr. Olsen,
I am emailing you to request that you revise the SLN label for GA-090001. The current label has the product name as Dual Magnum. Please revise the label so that Dual Magnum® Herbicide is used throughout the entire label.

If you have any questions or concerns, please contact me via phone or email.

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 5/6/2016 12:40:31 PM
To: Dinnen Pat USGR [pat.dinnen@syngenta.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: SLN for CO-160003, Propiconazole (Tilt) on grasses grown for seed

Thank you for your response. Have a great day!

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Thursday, May 05, 2016 2:44 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: SLN for CO-160003, Propiconazole (Tilt) on grasses grown for seed

Dear Ms. Cain:

Syngenta is moving toward adding Colorado to the Section 3 label for grasses grown for seed, but it will be awhile before we can submit the amendment to EPA. That is why the 24(c) is needed in Colorado at this time.

If you need additional information or have any more questions, please let me know.

Thank you,
Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Tuesday, May 03, 2016 5:08 PM
To: Dinnen Pat USGR
Cc: Maignan, Tawanda
Subject: SLN for CO-160003, Propiconazole (Tilt) on grasses grown for seed

Hi Ms. Dinnen,
I am emailing you because we have received an SLN for Colorado (CO-160003) for the use of propiconazole, Tilt (EPA Reg. No. 100-617), on grasses grown for seed to control diseases.

The Section 3 label limits this use to ID, MN, NE, OR and WA. I would like to know if this use is ok for Colorado and if so, is there any reason as to why it was not included on the Section 3 label.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 9/27/2016 3:02:21 PM
To: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Subject: RE: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Monday, September 26, 2016 10:09 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: FW: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Tamica,
Please see the attached label for SLN GA-090001 with the requested corrections.
Thanks,
Eric Olsen

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Monday, September 26, 2016 10:04 AM
To: Olsen, Eric
Subject: RE: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hello Eric,

Attached is the revised GA-090001 Dual Magnum SLN with the adjuvant restriction language added.

Thanks and regards,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, September 23, 2016 7:58 AM
To: Zang Larry USGR <larry.zang@syngenta.com>

Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: FW: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hi Larry,
I just received this request from EPA. Could you complete the requested addition to the label and return it to me?
Thanks,
Eric Olsen

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, September 22, 2016 1:53 PM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor)

Hi Mr. Olsen,
I am in the process of reviewing SLN amendment GA-090001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in broccoli, cabbage, cauliflower, Chinese cabbage, collards, kale, dry bulb onion, green onions, transplanted bell peppers, beans, cantaloupe, watermelon, carrot, sweet potato, tomato, and summer squash (yellow and zucchini). I am requesting that you please add the following bullet under Directions for Use and email me a copy of the revised label:

- **The risk of crop injury increases when adjuvants (e.g., non-ionic surfactants, crop oils, etc.), nitrogen sources (e.g., AMS, UAN), fertilizers or other pesticides are applied with Dual Magnum.**

If you have any questions, please do not hesitate to contact me.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 9/27/2016 1:36:26 PM
To: Wade, Christopher (DDA) [Christopher.Wade@state.de.us]
Subject: RE: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Wade, Christopher (DDA) [mailto:Christopher.Wade@state.de.us]
Sent: Monday, September 26, 2016 11:14 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Mrs. Cain,

Good morning. Please see below and the attached revised label. Thank you.

Chris Wade

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Monday, September 26, 2016 11:01 AM
To: Wade, Christopher (DDA)
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Dear Chris,

Attached is the revised Dual Magnum Herbicide DE-110001 SLN label with the adjuvant restriction language requested by EPA added. If you need anything else, please let me know.

Thank you,
Pat
Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

From: Zang Larry USGR
Sent: Monday, September 26, 2016 9:36 AM
To: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

---

From: Wade, Christopher (DDA) [mailto:Christopher.Wade@state.de.us]
Sent: Friday, September 23, 2016 8:28 AM
To: Zang Larry USGR <larry.zang@syngenta.com>
Subject: FW: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Larry,

Good morning1 Please see below. I received this request from EPA yesterday. Can you make this change to the label and send to me so I can forward to Mrs. Cain. Thank you.

Chris Wade

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Thursday, September 22, 2016 4:14 PM
To: Wade, Christopher (DDA)
Cc: Maignan, Tawanda
Subject: SLN Amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon

Hi Mr. Wade,
I am in the process of reviewing SLN amendment DE-110001, Dual Magnum® Herbicide (S-metolachlor), to control weeds in row middles in watermelon. I am requesting that you please add the following bullet under Directions for Use and email me a copy of the revised label:

- **The risk of crop injury increases when adjuvants (e.g., non-ionic surfactants, crop oils, etc.), nitrogen sources (e.g., AMS, UAN), fertilizers or other pesticides are applied with Dual Magnum.**

If you have any questions, please do not hesitate to contact me.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 5/3/2016 9:08:16 PM
To: Dinnen Pat USGR [pat.dinnen@syngenta.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: SLN for CO-160003, Propiconazole (Tilt) on grasses grown for seed

Hi Ms. Dinnen,
I am emailing you because we have received an SLN for Colorado (CO-160003) for the use of propiconazole, Tilt (EPA Reg. No. 100-617), on grasses grown for seed to control diseases.

The Section 3 label limits this use to ID, MN, NE, OR and WA. I would like to know if this use is ok for Colorado and if so, is there any reason as to why it was not included on the Section 3 label.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 9/15/2016 5:56:52 PM
To: Shane Howe [shane.howe@wyo.gov]
CC: Polly Cross [polly.cross@wyo.gov]; Dinnen Pat USGR [pat.dinnen@syngenta.com]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: SLN Amendment WY-110001

Thank you!

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Shane Howe [mailto:shane.howe@wyo.gov]
Sent: Thursday, September 15, 2016 1:37 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Polly Cross <polly.cross@wyo.gov>; Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: SLN Amendment WY-110001

Hi Tamica,

Attached is the information you requested. Please let me know if you have any further questions. Have a great day!

--
Thank you,

Shane Howe

Pesticide Inspector
Technical Services
Wyoming Department of Agriculture
Office# 307-777-6959
Cell # 307-399-4389
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Act and may be disclosed to third parties.

Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 5/31/2016 1:13:55 PM
To: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
Subject: RE: SLN GA-160001 (Tribune)

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, May 27, 2016 9:07 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: SLN GA-160001 (Tribune)

Apologies.Have a good weekend.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Friday, May 27, 2016 8:51 AM
To: Olsen, Eric
Cc: Dinnen Pat USGR
Subject: RE: SLN GA-160001 (Tribune)

Hi, thanks Eric
Can you please resend because the attachment wasn't there. Thanks

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, May 27, 2016 7:33 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: RE: SLN GA-160001 (Tribune)
Importance: High

Tamica,

Attached to this e-mail you will find the corrected Tribune SLN label GA160001.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Wednesday, May 11, 2016 3:10 PM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN GA-160001 (Tribune)

Hi Mr. Cofer,
I am emailing to request that you submit a revised label for SLN AL-160001. The label we received was incomplete and had the incorrect EPA registration number. Please make the following revisions:

- EPA SLN No. GA-160001
- On page 2 of the SLN label, in the Application Rates For Submersed Weeds Chart ; please change surface area to surface "acre" as per page 16 of the Section 3 label

When you have revised the label, please email me a copy.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 5/27/2016 12:50:32 PM
To: Olsen, Eric [Eric.Olsen@agr.georgia.gov]
CC: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Subject: RE: SLN GA-160001 (Tribune)

Hi, thanks Eric
Can you please resend because the attachment wasn't there. Thanks

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Friday, May 27, 2016 7:33 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>
Subject: RE: SLN GA-160001 (Tribune)
Importance: High

Tamica,
Attached to this e-mail you will find the corrected Tribune SLN label GA160001.

From: Cain, Tamica [mailto:Cain.Tamica@epa.gov]
Sent: Wednesday, May 11, 2016 3:10 PM
To: Olsen, Eric
Cc: Maignan, Tawanda
Subject: SLN GA-160001 (Tribune)

Hi Mr. Cofer,
I am emailing to request that you submit a revised label for SLN AL-160001. The label we received was incomplete and had the incorrect EPA registration number. Please make the following revisions:

- EPA SLN No. GA-160001
- On page 2 of the SLN label, in the Application Rates For Submersed Weeds Chart ; please change surface area to surface "acre" as per page 16 of the Section 3 label

When you have revised the label, please email me a copy.

Thank you.

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
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Message

From: Cain, Tamica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68290807E9B94FC5A871AEF3A12F40BA-CAIN, TAMIC]
Sent: 4/8/2016 6:42:01 PM
To: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Subject: RE: Use Patterns for EPA SLN No. SC-160001. Reflex Herbicide (EPA Reg. No. 100-993)

Thank you

Tamica L. Cain, M.S.
Biologist
United States Environmental Protection Agency
Office of Pesticide Programs-Minor Use and Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 347-8110

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Friday, April 08, 2016 2:18 PM
To: Cain, Tamica <Cain.Tamica@epa.gov>
Subject: FW: Use Patterns for EPA SLN No. SC-160001. Reflex Herbicide (EPA Reg. No. 100-993)

Dear Tamica:

As discussed in our telephone conversation on Wednesday, April 8, 2016, following is an explanation to your questions regarding for Reflex Herbicide (EPA Reg. No. 100-993), EPA SLN No. SC-160001.

1. **Use Patterns on the SLN SC-160001 Do Not Match Use Patterns on the Reflex Section 3 Label**

   Use patterns for pumpkin, squash, and watermelon are listed on the Fomesafen Sodium Human Health Risk Assessment EPA memorandum, DP No. D403953, 410795 dated July 18, 2013, page 9 (attached). The use patterns for pumpkin, squash, and watermelon are direct seeded or transplant. On the SLN the use patterns are listed as Bare Ground Seeded and Bare Ground Transplant which is the same as direct seeded and transplant. The SLN also lists use in plastic mulch systems where the crop is transplanted following application under plastic mulch or over the top of plastic mulch and washed off.

2. **Crop Rotation Table on SLN SC-160001 Does Not Match Crop Rotation Table on the Reflex Section 3 Label**

   The crop rotation table on the Section 3 label reflects the use pattern for the registered uses on the Section 3 label. The 24(c) label expands in-season use on squash, pumpkin and watermelon, therefore, the rotational interval was reduced to zero for these crops. Based on the use patterns specific to this SLN for South Carolina a reduction in the plant back interval was warranted for cantaloupe, cucumber, pepper, and tomato. These plant back intervals were established to avoid any potential of crop injury. Also, cantaloupe, cucumber, pepper, and tomato do have established tolerances. The 10 month plant back interval for sorghum is the same as the Section 3 label (i.e. South Carolina is in Region 1 which has a 10 month plant back interval to sorghum).

Use patterns can be very specific on these crops and we would be happy to set up a conference call to answer any other questions you may have.

Thank you,

Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Sent: 1/8/2018 6:24:07 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Conrath, Andrea B [Conrath.Andrea@epa.gov]; Saundra L Mistysyn [saundra.mistysyn@basf.com]; Michele Barton - CDA [michele.barton@state.co.us]
Subject: Revised SLN label (added expiration date): CO060002 Prowl H2O on onions
Attachments: letter and label to EPA revised label CO-060002 Prow H2O on Onions.pdf

An official version of the attached SLN revised label notification will come via fed ex. But since the last one we fed exed arrived without one of the SLN pages, figured I would also send an electronic version.

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

COLORADO
Department of Agriculture
Division of Plant Industry

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

Message

From: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Sent: 12/29/2017 11:02:38 PM
To: Conrath, Andrea B [Conrath.Andrea@epa.gov]
CC: Saundra L Mistysyn [saundra.mistysyn@basf.com]
Subject: Re: SLN# CO-060002 (Amended label) - REVISION needed

I sent it snail mail. I believe I asked Tawanda, and she just wanted them send normal mail, not email. I used to do both. Could be we copied it wrong. But stuff hasn't made it through your front end processing before.

Laura Quakenbush, Ph.D.
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On Fri, Dec 29, 2017 at 3:54 PM, Conrath, Andrea B <Conrath.Andrea@epa.gov> wrote:

Laura - Thanks for sending this! Did you send by email or hardcopy the first time? I didn't think our file room copies them but just forwards to us. But if you sent email then – someone must have copied 1-sided… but now we have both, so thanks!

Please forward the revised label as soon as you have it – thanks very much!

Andrea

Andrea B. Conrath
Biologist, Emergency Response Team
Registration Division – Office of Pesticide Programs
United States Environmental Protection Agency
Phone: 703.308.8156 Fax: 703.605.0781
conrath.andrea@epa.gov

Office & Courier:
S-7335, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Mailing Address:
USEPA – OPP (7505P)
1200 Pennsylvania Ave NW
Washington, DC 20004

Visit http://www.EPA.gov/pesticides/regulating/section18_training

From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Friday, December 29, 2017 5:18 PM
To: Conrath, Andrea B <Conrath.Andrea@epa.gov>; Saundra L Mistysyn <saundra.mistysyn@basf.com>
Subject: Re: SLN# CO-060002 (Amended label) - REVISION needed

Andrea, Attached is the 3-page revised label that was sent to EPA. I must have printed it double-sided but your office copied it single sided?

I would assume BASF will want to post this on their website, but we also post all of our SLN labels on our CDA SLN webpage.

Saundra, EPA requires changes on this revised Colorado SLN label. You need to remove the "supplemental label" and replace with a statement such as:

FIFRA Section 24(c) Special Local Need Label

FIFRA Section 24(c) Special Local Need Registration

Special Local Need Registration Under FIFRA 24(c)

Registration Under FIFRA Section 24(c) for Special Local Need

Send email me the revised label pdf file, so that I can review and then send on to EPA. And also update our files and webpage.

Laura Quakenbush, Ph.D.

Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860

305 Interlocken Parkway, Broomfield, CO 80021

laura.quakenbush@state.co.us | www.colorado.gov/ag

On Fri, Dec 29, 2017 at 3:03 PM, Conrath, Andrea B <Conrath.Andrea@epa.gov> wrote:

Hello Laura –

During a review of this action we noted that a revised label is needed for this special local need registration under FIFRA 24(c).

First off, there appears to be a page missing from the label; your package (as rec'd by me) only has p.1 and p.3 of the label. Since it is a hard copy that was stamped by our file room, it appears to have arrived with this page missing.

However, a few things were noted from what was submitted:

Please remove the words "Supplemental Label" (since "Supplemental" labels are not the same thing as SLN labels). And while the small print does refer to "This special local need label …" it must clearly state that it is a registration under section 24(c) of FIFRA.

Here are some examples of statements which would correct both of these issues (with statements placed prominently near the beginning of the label):

FIFRA Section 24(c) Special Local Need Label

FIFRA Section 24(c) Special Local Need Registration

Special Local Need Registration Under FIFRA 24(c)

Registration Under FIFRA Section 24(c) for Special Local Need

Please contact the registrant for a revised label at your earliest convenience and you may email a copy directly to me for including in the file for this action.

Once we receive a complete (and revised) label we can continue to review this action.

Additionally – I did not see a copy of this SLN registration in the listing on the BASF (registrant) website (although I saw several others for different states for the same use pattern). You may want to follow up with them on this.

Let me know if any questions – thanks!

Andrea

Andrea B. Conrath

Biologist, Emergency Response Team
Registration Division – Office of Pesticide Programs
United States Environmental Protection Agency
Phone: 703 308 8156 Fax: 703 605 0781
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Mailing Address
USEPA – OPP (7505P)
1200 Pennsylvania Ave NW
Washington, DC 20004

Visit http://www.EPA.gov/pesticides/regulating/section18_training

Message

From: Saundra L Mistysyn [saundra.mistysyn@basf.com]
Sent: 12/29/2017 10:55:39 PM
To: Conrath, Andrea B [Conrath.Andrea@epa.gov]
Subject: Automatic reply: SLN# CO-060002 (Amended label) - REVISION needed

I am currently out of the office for the holidays. If you need immediate assistance, please contact Wendy Bair Johnson at wendy.bair-johnson@basf.com. Otherwise, I will respond to all inquiries upon my return on Monday, January 2, 2018.
Happy Holidays!

Message

From: Colton B Bond [cbond@oda.state.or.us]
Sent: 2/13/2018 10:57:11 PM
To: Christine Villegas [christine.villegas@bayer.com]; danyel.ward@bayer.com; Barry Duerk [barry.duerk@bayer.com]; Ben.Miller@agri.idaho.gov; nancy@oregonhops.org; clparker@tricity.wsu.edu; ageorge@wahops.org; Rose Kachadoorian [rkachadoorian@oda.state.or.us]; Jones, Lenora J [lenora.jones@wsu.edu]; Conrath, Andrea B [Conrath.Andrea@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Revised SLN Registration: SLN No. OR-040018, Aliette WDG Fungicide/Aerial Application - Hops
Attachments: Letter_Aliette WDG Fungicide (EPA SLN No. OR-040018).pdf; Label_Aliette WDG Fungicide (EPA SLN No. OR-040018).pdf

Greetings all,

ODA has approved a revised FIFRA Section 24(c) Special Local Need (SLN) label for aerial application of Bayer CropScience Aliette WDG Fungicide, EPA Reg. No. 264-516 on hops for downy mildew control in Oregon.

Attached for your information are the registration transmittal letter to EPA and the SLN label.

If you have any questions please don't hesitate to contact me.

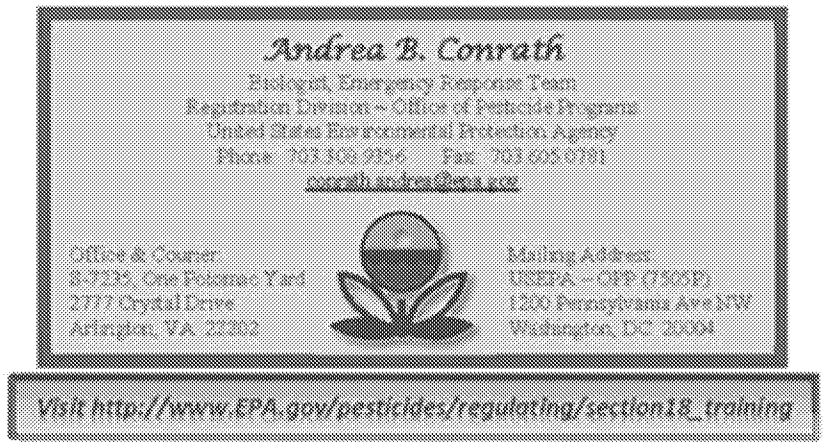
Best Wishes,

Colton Bond, MS | Registration & Certification Specialist
Pesticides Program | Oregon Department of Agriculture
Phone: (503) 986-6485

Message

From: Conrath, Andrea B [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9A1D0E54BC37471BB68AA8ED0C57BB77-ANDREA B. CONRATH]
Sent: 1/8/2018 11:17:54 PM
To: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Saundra L Mistysyn [saundra.mistysyn@basf.com]; Michele Barton - CDA [michele.barton@state.co.us]
Subject: RE: Revised SLN label (added expiration date): CO060002 Prowl H2O on onions

Thanks Laura, I appreciate it!
Andrea



From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Monday, January 08, 2018 1:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Conrath, Andrea B <Conrath.Andrea@epa.gov>; Saundra L Mistysyn <saundra.mistysyn@basf.com>; Michele Barton - CDA <michele.barton@state.co.us>
Subject: Revised SLN label (added expiration date): CO060002 Prowl H2O on onions

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Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

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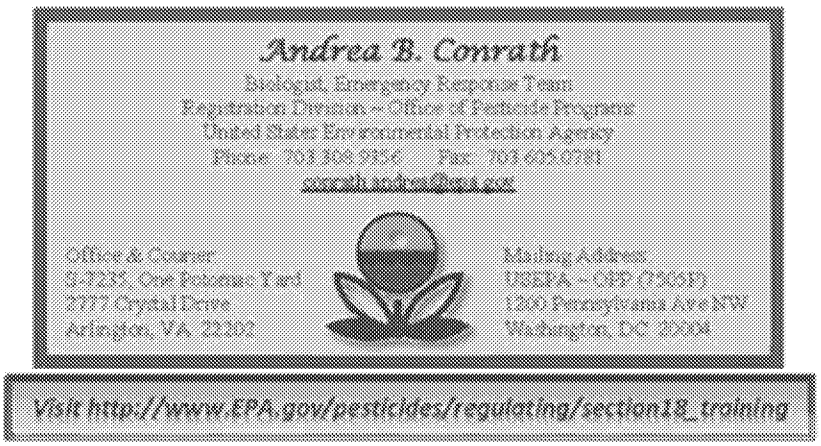
Message

From: Conrath, Andrea B [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9A1D0E54BC37471BB68AA8ED0C57BB77-ANDREA B. CONRATH]
Sent: 12/29/2017 11:23:44 PM
To: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Subject: RE: SLN# CO-060002 (Amended label) - REVISION needed

Yes, that is correct – we still want the SLNs to come in hard copy as far as I know. I will let you know if that changes however!



From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Friday, December 29, 2017 6:03 PM
To: Conrath, Andrea B <Conrath.Andrea@epa.gov>
Cc: Saundra L Mistysyn <saundra.mistysyn@basf.com>
Subject: Re: SLN# CO-060002 (Amended label) - REVISION needed

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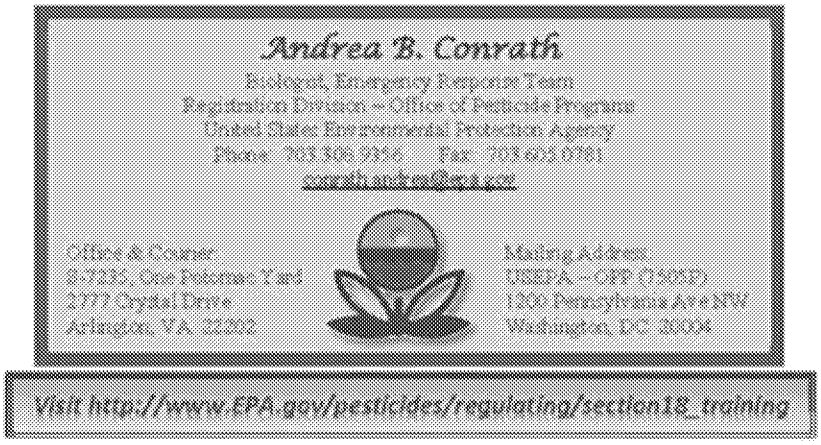

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Sent: Friday, December 29, 2017 5:18 PM
To: Conrath, Andrea B <Conrath.Andrea@epa.gov>; Saundra L Mistysyn <saundra.mistysyn@basf.com>
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Send email me the revised label pdf file, so that I can review and then send on to EPA. And also update our files and webpage.

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Pesticide Registration Coordinator

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Biologist, Emergency Response Team
Registration Division – Office of Pesticide Programs
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Phone: 703 308 8156 Fax: 703 605 0781
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Visit http://www.EPA.gov/pesticides/regulating/section18_training

Message

From: Conrath, Andrea B [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9A1D0E54BC37471BB68AA8ED0C57BB77-ANDREA B. CONRATH]
Sent: 8/3/2017 8:50:32 PM
To: Arrington, Linda [Arrington.Linda@epa.gov]; Jones, Ricardo [Jones.Ricardo@epa.gov]; Balan, Aswathy [Balan.Aswathy@epa.gov]; Joyner, Shaja [Joyner.Shaja@epa.gov]
CC: Biggio, Patricia [biggio.patricia@epa.gov]
Subject: RE: Fosetyl-Al Label Mitigations

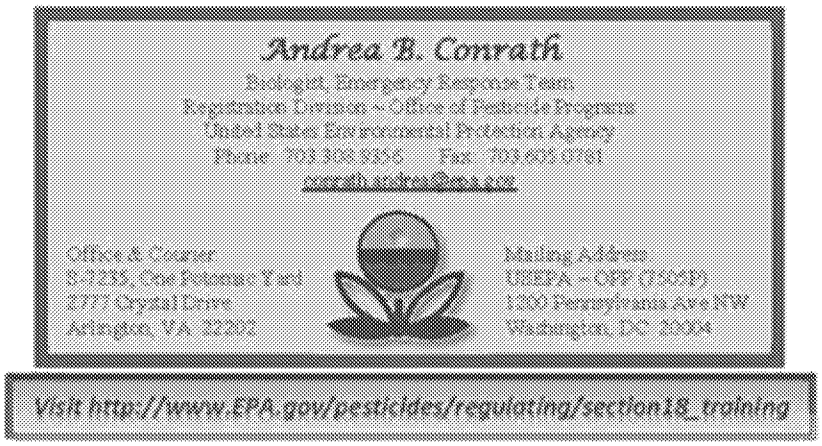
Hi Ricardo / Linda –

Nonresponsive Discussion of Personal Matters / Ex. 6

Deliberative Process / Ex. 5

Thanks!

Andrea



From: Arrington, Linda
Sent: Thursday, August 03, 2017 1:38 PM
To: Jones, Ricardo <Jones.Ricardo@epa.gov>; Conrath, Andrea B <Conrath.Andrea@epa.gov>; Balan, Aswathy <Balan.Aswathy@epa.gov>; Joyner, Shaja <Joyner.Shaja@epa.gov>
Cc: Biggio, Patricia <biggio.patricia@epa.gov>
Subject: RE: Fosetyl-Al Label Mitigations

Thanks so much Ricardo and everyone on the call yesterday.

Linda Arrington, Branch Chief

RMIB 5
Pesticide Re-evaluation Division
Office 703 305 6249
Fax 703 308 8005

From: Jones, Ricardo
Sent: Thursday, August 03, 2017 10:58 AM
To: Arrington, Linda <Arrington.Linda@epa.gov>; Conrath, Andrea B <Conrath.Andrea@epa.gov>; Balan, Aswathy <Balan.Aswathy@epa.gov>; Joyner, Shaja <Joyner.Shaja@epa.gov>
Cc: Biggio, Patricia <biggio.patricia@epa.gov>
Subject: RE: Fosetyl-Al Label Mitigations

Linda,

Deliberative Process / Ex. 5

Ricardo

From: Arrington, Linda
Sent: Thursday, July 27, 2017 9:06 AM
To: Conrath, Andrea B <Conrath.Andrea@epa.gov>; Balan, Aswathy <Balan.Aswathy@epa.gov>; Joyner, Shaja <Joyner.Shaja@epa.gov>; Jones, Ricardo <Jones.Ricardo@epa.gov>
Subject: FW: Fosetyl-Al Label Mitigations

Here is the email that we need to talk about. Look for the meeting request soon.

Linda Arrington, Branch Chief
RMIB 5
Pesticide Re-evaluation Division
Office 703 305 6249
Fax 703 308 8005

From: Terrie Moore [mailto:terrie.moore@bayer.com]
Sent: Thursday, July 20, 2017 2:16 PM
To: Arrington, Linda <Arrington.Linda@epa.gov>
Cc: BCSReg_Archive <esepamailbox@bayer.com>
Subject: Fosetyl-Al Label Mitigations

Hi Linda,

I was hoping to discuss the Fosetyl-Al label mitigations with you, but I wanted to provide some information that I am hoping will be useful for our discussion. I have created a table (below) with the different rates on the 2 fosetyl-Al products we have.

The wording we have on the label for the maximum use rate per year was submitted to Ricardo Jones when he was the relevant CRM and he had indicated this language acceptable as we would be at the same limit that Risk Assessments were performed with. One of the main reasons that we would like to state the maximum amount of AI is that it would be easier for users to track how much they use especially if they use different products containing fosetyl-Al. This is especially important in the turf area where multiple products may be used containing the same ai. The wording we submitted to Ricardo and currently on the submitted labels is the following

- On 432-890 it states
  "Do not exceed a total of 180 lb of product per acre, per crop, per year." – for ornamentals
  "Do not exceed a total of 180 lbs of product per acre, per year." – for turf
- On 432-1541 it states
  "Do not exceed a total of 240 lb of product per acre, per year."

If you take a look at the rate comparisons below (and in attached excel doc), you can see that the different rates would mean different amounts being applied and this would not be consistent label to label. We would get a lot of questions from users on why a product with lower ai content would not be given the same yearly maximum as a product with a higher ai content. This could drive people to use higher rates knowing that they are limited in the number applications vs. the amount of ai applied. This is not a situation that we would want.

I am also very concerned about the line that I highlighted at the 8 oz rate of 432-890. 11 applications at this rate would go over the 144 lbs ai/A that Risk Assessments were done with during Registration Review. We want to be good stewards of our products and do not want users applying over the amount used for Risk Assessments. I am hoping that we could discuss the wording for the label mitigations. Would you be available anytime this afternoon or sometime tomorrow?

Reg. Number	Product	Crop	Rate (oz/1000 sq ft)	Rate lbs/A	# of Applications per year (144 lbs/A)	lbs/A If 11 apps	Application Method
432-890	Chipco Signature	Turf	4	8.695652174	16.56	95.65217	Foiliar
432-890	Chipco Signature	Turf	6	13.04347826	11.04	143.4783	Foiliar
432-890	Chipco Signature	Turf	8	17.39130435	8.28	191.3043	Foiliar
432-1541	Signature Xtra	Turf	2	3.260869565	44.16	35.86957	Foiliar
432-1541	Signature Xtra	Turf	4	6.52173913	22.08	71.73913	Foiliar
432-1541	Signature Xtra	Turf	6	9.782608696	14.72	107.6087	Foiliar

Reg. Number	Product	Crop	Rate (lbs/100 gal)	Rate lbs/A	# of Applications per year (144 lbs/A)	lbs/A If 11 apps	Application Method
432-890	Chipco Signature	Ornamentals	1.25	1.25	115.2	13.75	Foiliar
432-890	Chipco Signature	Ornamentals	2.5	2.5	57.6	27.5	Foiliar
432-890	Chipco Signature	Ornamentals	5	5	28.8	55	Foiliar

Thank you and have a great day!

Best regards,

Terrie Moore, Ph.D.
Regulatory Affairs Manager

Science For A Better Life

Bayer U.S. LLC
CropScience Division
Environmental Science Division
Regulatory Affairs
2 TW Alexander Dr.
RTP, NC 27703, USA

Tel: +1 919 549 5678
Fax:
Mobile: +1 919 491 0708
E-mail: terrie.moore@bayer.com
Web: http://www.bayer.com

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Message

From: Wait, Monica [Wait.Monica@epa.gov]
Sent: 3/2/2016 2:58:27 PM
To: Shelby, Andrew [Shelby.Andrew@epa.gov]
CC: Corbin, Mark [Corbin.Mark@epa.gov]
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps
Attachments: 1,3-D Telone trsmtl letter re. multi waiver requests 1-28-16.pdf; Telone (1,3-D) RR DCI 8-6-14.pdf; Telone (1,3-D) RR Problem Form 8-27-13.pdf

Hi Andrew,

Thanks for the speedy response on Meg's telone email! A couple follow-up questions:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Monica

From: Shelby, Andrew
Sent: Tuesday, March 01, 2016 10:47 AM
To: Wait, Monica <Wait.Monica@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Monica,

Deliberative Process / Ex. 5

From: Hathaway, Margaret
Sent: Monday, February 29, 2016 4:10 PM
To: Wait, Monica <Wait.Monica@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Shelby, Andrew <Shelby.Andrew@epa.gov>; Rothman, Gabe <Rothman.Gabe@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Monica:
Most of the recent 1,3-D talk has been dominated by air monitoring work, but now it is EFED's turn again! The 1,3-D registrant is following up from the big multi-data requirement DER we sent them and is looking for guidance regarding GLNs 835.4100 and 835.4400. See below for the registrants questions.

-

-

Deliberative Process / Ex. 5

Thanks,

Meg Hathaway

From: Baxter, Jim (JP) [mailto:jpbaxter@dow.com]
Sent: Monday, February 29, 2016 10:02 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Guenthenspberger, Katherine (K) <KGuenthenspberger@dow.com>; Carroll, Joyce (A) <jacarroll@dow.com>
Subject: 1,3-D Registration Review - Agency science contact for Fate & Metabolism, Next Steps

Dear Meg,

I would greatly your help and guidance to provide an Agency science contact point for our Environmental Fate and Metabolism Expert for 1,3-D, Katherine Guenthenspberger.

Katherine and I are trying to determine the best next steps for the DCI fate and metabolism studies in view of your January 28 email (Subject: Status of Environmental Fate and Ecological Effects Data Waiver Requests for 1,3-Dichloropropene (Telone)) and attachments, which contained Agency decisions based on Dow AgroSciences' DCI response for data citations and waiver requests for various studies.

Specifically, we have 2 topics to propose for discussion:

1. The Agency's status for the Aerobic Soil Metabolism Studies for Parent 1,3-D and Degradates CAAL and CAAC is noted: *"Cited data are in Agency Review. The data requirement currently remains unsatisfied."* The key question for us...should we plan to go forward with new studies or will cited data fulfill the requirement? It would be very helpful for Katherine to dialogue with your review scientist to gain insights to resolve the question...and work toward study plans if required.

2. The Agency's status for the Anaerobic Aquatic Metabolism Studies for the Degradates CAAL and CAAC is noted: *"**Waiver request denied**. A new study submission is expected from the registrant. Cited data are in review with the Agency."* There are two (2) elements to resolve:

    - Confirmation that the anaerobic aquatic metabolism study for Parent 1,3-D is NOT a DCI requirement. The Agency's Feb. 10, 2015 Memo (PC Code: 029001; DP Barcode: 424497, 424499, 424500, 424538, 424544, 424535, 424519) on page 2 lists Parent 1,3-D and the degrades as needing studies. We believe the data requirement for Parent 1,3-D is already fulfilled as it was NOT on the DCI.

    - Due the very challenging nature of these studies for these particular compounds, DAS would greatly appreciate additional time to fulfill the data requirements for the CAAC and CAAL. We propose a study completion date of March 31, 2018.

Should you have any questions or require any additional information, please let me know.

Many thanks for your consideration.

Best Regards,
Jim

Jim Baxter
U.S. & Global Regulatory Leader - Soil Fumigants
Dow AgroSciences LLC

Office: (317) 337-4388
Mobile: (317) 341-4302
jpbaxter@dow.com

Message

From: Zinn, Nicole [Zinn.Nicole@epa.gov]
Sent: 7/7/2016 1:18:20 PM
To: Moriarty, Thomas [Moriarty.Thomas@epa.gov]; Corbin, Mark [Corbin.Mark@epa.gov]; Wait, Monica [Wait.Monica@epa.gov]; Yang, Yung [Yang.Yung@epa.gov]; Barnes, Yvonne [Barnes.Yvonne@epa.gov]; Shelat, Shalu [Shelat.Shalu@epa.gov]; Bobowiec, Bridgett [Bobowiec.Bridgett@epa.gov]; Davis, Donna [Davis.Donna@epa.gov]; Jarboe, Stephen [Jarboe.Steve@epa.gov]; Shah, Aruna [Shah.Aruna@epa.gov]; Donovan, Elizabeth [Donovan.Elizabeth@epa.gov]
CC: Sims, Diann [Sims.Diann@epa.gov]
Subject: FW: Pendimethalin Use Summary Tables
Attachments: Copy of OPP Use Summary Table ver 1 1_Pendimethalin_agricultural uses_6-30-2016.xlsx; Copy of OPP Use Summary Table ver 1 1_Pendimethalin_non-agricultural uses_6-30-2016.xlsx

Hi everyone,

Here are the revised pendimethalin USTs from BASF. Changes are highlighted in the Excel spreadsheets. There are also notes from BASF explaining some of the information provided (see email below and the notes added to the spreadsheet).

Please let me know if you have any questions.

Thanks,
Nicole

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Thursday, June 30, 2016 4:51 PM
To: Zinn, Nicole <Zinn.Nicole@epa.gov>; cswick@lewisharrison.com; diane.fago@uniphos.com; Lchan@drexchem.com; space@drexchem.com; Rebecca Clemmer <rebecca.clemmer@uniphos.com>; Timothy A Mahl <timothy.mahl@basf.com>; John J Arthur <john.arthur@basf.com>; leanne@pyxisrc.com
Cc: Moriarty, Thomas <Moriarty.Thomas@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Subject: RE: Pendimethalin Use Summary Tables

Nicole,

In response to your email and to the BEAD memo dated March 30 2016, please see my comments to the bullets points below in blue.

Please find attached the revised USTs.

Let me know if you (or BEAD) have any further questions or concerns.

Regards
Craig Kleppe
Product Registration Manager

Phone: +1 919 547-2615 Personal Phone / Ex. 6 Fax: +1 919 547-2850 E-Mail: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, P.O. Box 13528, Research Triangle Park, NC 27709, USA

150 years
BASF - We create chemistry

All contents of this e-mail and any attachments thereto are confidential unless explicitly specified otherwise in this e-mail. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system.

From: Zinn, Nicole [mailto:Zinn.Nicole@epa.gov]
Sent: Monday, May 02, 2016 8:17 AM
To: Craig D Kleppe <craig.kleppe@basf.com>; cswick@lewisharrison.com; diane.fago@uniphos.com; Lchan@drexchem.com; space@drexchem.com; Rebecca Clemmer <rebecca.clemmer@uniphos.com>; Timothy A Mahl <timothy.mahl@basf.com>; John J Arthur <john.arthur@basf.com>; leanne@pyxisrc.com
Cc: Moriarty, Thomas <Moriarty.Thomas@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Subject: Pendimethalin Use Summary Tables

Hi everyone,

Thank you for sending in the use summary tables (USTs). BEAD has reviewed the three use summary tables (see attached).

The use summary tables will be used during the registration review process, including to help with risk characterization and to help prepare for any label clean-up efforts that may be needed. As BEAD notes, there were a few items that were unclear in the submitted USTs. The Agency requests clarification as noted below.

- No SLNs are represented in the USTs. One use site is missing as a result. Please reevaluate the SLNs to ensure that all use sites and use information is captured. All the SLN uses (delayed PRE on dry bulb onions, loop stage dry bulb onions, clover grown for seed, biofuel crops, guayule) have been added to the UST.

  Also, a new Section 3 use on African marigold has been added to the UST.

  Also, renamed "Perennial warm- or cool-season grasses" as "Perennial warm- or cool-season forage grasses"

BASF Corporation and Drexel Chemical Company – Agricultural

- Maximum number of applications per crop cycle and per year cannot be applied at the maximum single application rate as noted on the UST without exceeding the maximum annual application rate. Please correct or clarify. To provide clarification, added a footnote to column E (Max # of Apps annually for use site) to signify that "the label for use site indicates a use rate range of X-XX lbs AI/A, so up to X applications of lowest rate can be applied without exceeding annual maximum rate for use site".
- Maximum annual application rate, maximum single application rate and annual maximum application rate (label #241-418) is lower in the UST than on the label. The Agency would appreciate clarification. If these are proposed changes to the label, the values should be designated as such by adding as "***" following the data point in the UST. The rates for Farmstead use have been corrected on the UST to match those on the 241-418 label.
- UST is not representative of the geographic restrictions. The Agency could use other resources to obtain additional information about geographical restrictions but BASF Corporation and Drexel Chemical Company may want to consider including this information in the UST. Some crop uses (i.e. edible beans, lentils) have "state-specific uses instructions" to describe a unique use pattern for a certain geography based on agronomic fit and/or market potential, but they should not be considered restrictions to all other geographies, therefore they were not listed as such in the UST.

BASF Corporation and Drexel Chemical Company – Non-agricultural

- Site Annual Maximum Application Rate and Annual Maximum Application Rate
  - Information presented in UST for Turf grass, Sod and Residential Uses and Turf grass Golf, Commercial and Non-residential uses are not found on the label. Please clarify. If these are proposed changes to the label, the values should be designated as such by adding as "***" following the data point in the UST. Annual maximum use rates and maximum number of applications per year were clarified on the UST (and designated with ***) for the turfgrass use sites. The same was also entered into the UST for other non-turfgrass uses sites.

United Phosphorus Inc. – Agricultural and Non-agricultural

- There appears to be a typographical error for label #7050-230, 70506-318. Please confirm the correct rate.

For ease of use, the Agency would appreciate any attempts to merge the USTs.

Please let me know if you would like to discuss these comments in more detail. The Agency requests a response within 30 days.

Thanks,
Nicole

Nicole Zinn
Pesticide Re-evaluation Division
Office of Pesticide Programs
703-308-7076

Message

From: Wait, Monica [Wait.Monica@epa.gov]
Sent: 3/3/2016 6:16:25 PM
To: Hathaway, Margaret [Hathaway.Margaret@epa.gov]
CC: Shelby, Andrew [Shelby.Andrew@epa.gov]; Corbin, Mark [Corbin.Mark@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps
Attachments: 1,3-D Telone trsmtl letter re. multi waiver requests 1-28-16.pdf

Hi Meg,

Thanks for your note and forwarding the registrant's questions on the 1,3-D (telone) fate RR studies. I conferred with Andrew Shelby, the fate scientist for 1,3-D, and we have the following thoughts:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,

Monica Wait
Risk Assessment Process Leader
Environmental Fate and Effects Division, ERB 6
EPA / OSCPP / OPP
Phone: (703) 347-8019

From: Hathaway, Margaret
Sent: Monday, February 29, 2016 4:10 PM
To: Wait, Monica <Wait.Monica@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Shelby, Andrew <Shelby.Andrew@epa.gov>; Rothman, Gabe <Rothman.Gabe@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Monica:

Deliberative Process / Ex. 5

Thanks,
Meg Hathaway

From: Baxter, Jim (JP) [mailto:jpbaxter@dow.com]
Sent: Monday, February 29, 2016 10:02 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Guenthenspberger, Katherine (K) <KGuenthenspberger@dow.com>;

Carroll, Joyce (A) <jacarroll@dow.com>
Subject: 1,3-D Registration Review - Agency science contact for Fate & Metabolism, Next Steps

Dear Meg,

I would greatly your help and guidance to provide an Agency science contact point for our Environmental Fate and Metabolism Expert for 1,3-D, Katherine Guenthenspberger.

Katherine and I are trying to determine the best next steps for the DCI fate and metabolism studies in view of your January 28 email (Subject: Status of Environmental Fate and Ecological Effects Data Waiver Requests for 1,3-Dichloropropene (Telone)) and attachments, which contained Agency decisions based on Dow AgroSciences' DCI response for data citations and waiver requests for various studies.

Specifically, we have 2 topics to propose for discussion:

1. The Agency's status for the Aerobic Soil Metabolism Studies for Parent 1,3-D and Degradates CAAL and CAAC is noted: *"Cited data are in Agency Review. The data requirement currently remains unsatisfied."* The key question for us...should we plan to go forward with new studies or will cited data fulfill the requirement? It would be very helpful for Katherine to dialogue with your review scientist to gain insights to resolve the question...and work toward study plans if required.

2. The Agency's status for the Anaerobic Aquatic Metabolism Studies for the Degradates CAAL and CAAC is noted: *"**Waiver request denied**. A new study submission is expected from the registrant. Cited data are in review with the Agency."* There are two (2) elements to resolve:

    - Confirmation that the anaerobic aquatic metabolism study for Parent 1,3-D is NOT a DCI requirement. The Agency's Feb. 10, 2015 Memo (PC Code: 029001; DP Barcode: 424497, 424499, 424500, 424538, 424544, 424535, 424519) on page 2 lists Parent 1,3-D and the degrades as needing studies. We believe the data requirement for Parent 1,3-D is already fulfilled as it was NOT on the DCI.

    - Due the very challenging nature of these studies for these particular compounds, DAS would greatly appreciate additional time to fulfill the data requirements for the CAAC and CAAL. We propose a study completion date of March 31, 2018.

Should you have any questions or require any additional information, please let me know.

Many thanks for your consideration.

Best Regards,
Jim

Jim Baxter
U.S. & Global Regulatory Leader - Soil Fumigants
Dow AgroSciences LLC
Office: (317) 337-4388
Mobile: Personal Phone / Ex. 6
jpbaxter@dow.com

Message

From: Wait, Monica [Wait.Monica@epa.gov]
Sent: 3/3/2016 5:25:08 PM
To: Shelby, Andrew [Shelby.Andrew@epa.gov]; Corbin, Mark [Corbin.Mark@epa.gov]
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps
Attachments: 1,3-D Telone trsmtl letter re. multi waiver requests 1-28-16.pdf

Hi Andrew and Mark,

Below is an email I crafted to Meg in PRD responding to registrant / her questions on telone RR data. Any comments or word tweaking you'd like to see before I send it?

Hi Meg,

Thanks for your note and forwarding the registrant's questions on the 1,3-D (telone) fate RR studies. I conferred with Andrew Shelby, the fate scientist for 1,3-D, and we have the following thoughts:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,

Monica Wait
Risk Assessment Process Leader
Environmental Fate and Effects Division, ERB 6
EPA / OSCPP / OPP
Phone: (703) 347-8019

From: Hathaway, Margaret
Sent: Monday, February 29, 2016 4:10 PM
To: Wait, Monica <Wait.Monica@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Shelby, Andrew <Shelby.Andrew@epa.gov>; Rothman, Gabe <Rothman.Gabe@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Monica:
Most of the recent 1,3-D talk has been dominated by air monitoring work, but now it is EFED's turn again! The 1,3-D registrant is following up from the big multi-data requirement DER we sent them and is looking for guidance regarding GLNs 835.4100 and 835.4400. See below for the registrants questions.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thanks,
Meg Hathaway

From: Baxter, Jim (JP) [mailto:jpbaxter@dow.com]
Sent: Monday, February 29, 2016 10:02 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Guenthenspberger, Katherine (K) <KGuenthenspberger@dow.com>; Carroll, Joyce (A) <jacarroll@dow.com>
Subject: 1,3-D Registration Review - Agency science contact for Fate & Metabolism, Next Steps

Dear Meg,

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Katherine and I are trying to determine the best next steps for the DCI fate and metabolism studies in view of your January 28 email (Subject: Status of Environmental Fate and Ecological Effects Data Waiver Requests for 1,3-Dichloropropene (Telone)) and attachments, which contained Agency decisions based on Dow AgroSciences' DCI response for data citations and waiver requests for various studies.

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    - Due the very challenging nature of these studies for these particular compounds, DAS would greatly appreciate additional time to fulfill the data requirements for the CAAC and CAAL. We propose a study completion date of March 31, 2018.

Should you have any questions or require any additional information, please let me know.

Many thanks for your consideration.

Best Regards,
Jim

Jim Baxter
U.S. & Global Regulatory Leader - Soil Fumigants
Dow AgroSciences LLC
Office: (317) 337-4388
Mobile: Personal Phone / Ex. 6
jpbaxter@dow.com

Message

From: Wait, Monica [Wait.Monica@epa.gov]
Sent: 9/7/2016 6:11:42 PM
To: Hathaway, Margaret [Hathaway.Margaret@epa.gov]
CC: Britton, Cathryn [Britton.Cathryn@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Corbin, Mark [Corbin.Mark@epa.gov]; Donovan, Elizabeth [Donovan.Elizabeth@epa.gov]; Rothman, Gabe [Rothman.Gabe@epa.gov]; Shelby, Andrew [Shelby.Andrew@epa.gov]
Subject: FW: 1,3-D anaerobic aquatic metab. question for next Thursday
Attachments: 13-D Reg Review Response to EPA anaerobic aquatic studies June 29 2016.pdf; 1,3-D Telone trsmtl letter re. multi waiver requests 1-28-16.pdf

Hi Meg,

Deliberative Process / Ex. 5

Thanks,
Monica

From: Hathaway, Margaret
Sent: Friday, September 02, 2016 5:01 PM
To: Wait, Monica <Wait.Monica@epa.gov>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Rothman, Gabe <Rothman.Gabe@epa.gov>; Shelby, Andrew <Shelby.Andrew@epa.gov>
Subject: 1,3-D anaerobic aquatic metab. question for next Thursday

Hi Monica:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Thank you and best wishes for a relaxing Labor Day,
Meg

OLD EMAILS ABOUT ANAEROBIC AQUATIC METABOLISM AND 1,3-D:

From: Costello, Kevin
Sent: Monday, April 04, 2016 6:30 AM
To: Corbin, Mark <Corbin.Mark@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: 1,3-D Reg Review - Fate & Metabolism Next Steps

Mark-

Thanks. We appreciate it.

Kevin

From: Corbin, Mark
Sent: Friday, April 01, 2016 7:37 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>
Subject: Re: 1,3-D Reg Review - Fate & Metabolism Next Steps

Spoke with Andrew about this but will need to circle back with him and others next week. Been trying to get on the tech team agenda but last couple have been cancelled for various reasons

Mark

Sent from my iPhone

On Mar 31, 2016, at 6:16 PM, Hathaway, Margaret <Hathaway.Margaret@epa.gov> wrote:

> Hi Mark:
> My branch was wondering if you had any updates for us regarding anaerobic aquatic metabolism and 1,3-D. This study would take a long time for the registrants to conduct and may affect the overall timeline of this chemical's registration review, so PRD is looking for additional guidance from EFED on how this study would affect your 1,3-D PRA.
>
> Thanks,
> Meg Hathaway
>
> ---
>
> **From:** Costello, Kevin
> **Sent:** Tuesday, March 15, 2016 2:11 PM
> **To:** Hathaway, Margaret <Hathaway.Margaret@epa.gov>
> **Cc:** Britton, Cathryn <Britton.Cathryn@epa.gov>
> **Subject:** RE: 1,3-D Reg Review - Fate & Metabolism Next Steps

I left him a message.

From: Hathaway, Margaret
Sent: Tuesday, March 15, 2016 12:19 PM
To: Costello, Kevin <Costello.Kevin@epa.gov>
Cc: Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: RE: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Kevin:
Any news yet from Mark on the anaerobic aquatic metabolism data requirement for 1,3-D?

- Meg

From: Wait, Monica
Sent: Thursday, March 03, 2016 1:16 PM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Shelby, Andrew <Shelby.Andrew@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Meg,

Thanks for your note and forwarding the registrant's questions on the 1,3-D (telone) fate RR studies. I conferred with Andrew Shelby, the fate scientist for 1,3-D, and we have the following thoughts:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

<image001.png>
<image002.png>

Thanks,

Monica Wait
Risk Assessment Process Leader
Environmental Fate and Effects Division, ERB 6
EPA / OSCPP / OPP
Phone: (703) 347-8019

From: Hathaway, Margaret
Sent: Monday, February 29, 2016 4:10 PM
To: Wait, Monica <Wait.Monica@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Shelby, Andrew <Shelby.Andrew@epa.gov>; Rothman, Gabe <Rothman.Gabe@epa.gov>; Donovan, Elizabeth <Donovan.Elizabeth@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>
Subject: FW: 1,3-D Reg Review - Fate & Metabolism Next Steps

Hi Monica:
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Deliberative Process / Ex. 5

Thanks,
Meg Hathaway

From: Baxter, Jim (JP) [mailto:jpbaxter@dow.com]
Sent: Monday, February 29, 2016 10:02 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Cc: Costello, Kevin <Costello.Kevin@epa.gov>; Guenthenspberger, Katherine (K) <KGuenthenspberger@dow.com>; Carroll, Joyce (A) <jacarroll@dow.com>
Subject: 1,3-D Registration Review - Agency science contact for Fate & Metabolism, Next Steps

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Specifically, we have 2 topics to propose for discussion:

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Should you have any questions or require any additional information, please let me know.

Many thanks for your consideration.

Best Regards,
Jim

Jim Baxter
U.S. & Global Regulatory Leader - Soil Fumigants
Dow AgroSciences LLC
Office: (317) 337-4388
Mobile: Personal Phone / Ex. 6
jpbaxter@dow.com

Message

From: Jessica Fernandez [jessica.fernandez@bayer.com]
Sent: 6/5/2018 1:16:59 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Johnson, Hope [Johnson.Hope@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]; Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
CC: John.Inouye@cdpr.ca.gov; Danyel Ward [danyel.ward@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope and Tawanda,

We have had further internal discussion regarding the Pyrimethanil request discussed in the email trail below regarding an in-field use on mandarins (already registered as a post-harvest use). Since there is serious concern for development of resistance for the alternaria disease on mandarins in California (my understanding is that the growers only have two SDHI chemistries at the moment that are effective on the pest, which does not allow them the tools needed to follow proper FRAC code recommendations), and since ChemSAC is still reviewing the rationale document, but has not been able to provide guidance yet, I've been thinking of other options for how we may be able to move the process forward.

At this time, I am planning to submit the request under PRIA. I think this may help with the process and may allow more resources to be allocated to the review of the rationale document submitted previously to the Agency. Since there is already an existing food use for pyrimethanil on citrus, registered to Janssen (Penbotec 400 SC, EPA Reg. No. 43813-32) and we will be referencing their label and will not exceed the rates already registered on their label, I understand that a **R350**, would be the appropriate code.

I plan to make this submission by the end of June under PRIA. Since there is a significant concern in California and we would like to do what we can to help reduce development of resistance, I was wondering if it would be possible for ChemSAC to provide a preliminary opinion to CDPR, once I make the submission under R350. This would allow for the 24(c) process to move forward, while the Section 3 label amendment is within the PRIA review timeline.

Thanks so much for your help with this. Let me know if you need additional information , or if you have any guidance on the proposed path forward I've outlined above.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

//////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: Personal Phone / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Tuesday, May 08, 2018 12:29 PM
To: 'Maignan, Tawanda'; 'Johnson, Hope'; 'Johnson, Marion'; 'Giles-Parker, Cynthia'
Cc: 'John.Inouye@cdpr.ca.gov'; Danyel Ward; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you have received any communication back from ChemSAC on the Pyrimethanil rationale we submitted (referenced below).

Thanks!

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: + Personal Phone / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Tuesday, March 27, 2018 3:23 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thanks Tawanda.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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RTP NC 27709
United States

Mobile: + Personal Phone / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Tuesday, March 27, 2018 3:23 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I have not received any feedback at the moment and I do apologize for the delay. A message has been sent to ChemSac's attention inquiring on the status. Once I learn more I will let you know.

Thank you for your patience.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
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Mobile: Personal Phone / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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United States

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E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity

in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Research Triangle Park, NC 27709

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Mobile: + Personal Phone / Ex. 6
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a

Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Tel: +1 919 549 2631
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E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive

<esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
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E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

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Message

From: Jessica Fernandez [jessica.fernandez@bayer.com]
Sent: 6/5/2018 1:16:59 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Johnson, Hope [Johnson.Hope@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]; Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
CC: John.Inouye@cdpr.ca.gov; Danyel Ward [danyel.ward@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope and Tawanda,

We have had further internal discussion regarding the Pyrimethanil request discussed in the email trail below regarding an in-field use on mandarins (already registered as a post-harvest use). Since there is serious concern for development of resistance for the alternaria disease on mandarins in California (my understanding is that the growers only have two SDHI chemistries at the moment that are effective on the pest, which does not allow them the tools needed to follow proper FRAC code recommendations), and since ChemSAC is still reviewing the rationale document, but has not been able to provide guidance yet, I've been thinking of other options for how we may be able to move the process forward.

At this time, I am planning to submit the request under PRIA. I think this may help with the process and may allow more resources to be allocated to the review of the rationale document submitted previously to the Agency. Since there is already an existing food use for pyrimethanil on citrus, registered to Janssen (Penbotec 400 SC, EPA Reg. No. 43813-32) and we will be referencing their label and will not exceed the rates already registered on their label, I understand that a **R350**, would be the appropriate code.

I plan to make this submission by the end of June under PRIA. Since there is a significant concern in California and we would like to do what we can to help reduce development of resistance, I was wondering if it would be possible for ChemSAC to provide a preliminary opinion to CDPR, once I make the submission under R350. This would allow for the 24(c) process to move forward, while the Section 3 label amendment is within the PRIA review timeline.

Thanks so much for your help with this. Let me know if you need additional information , or if you have any guidance on the proposed path forward I've outlined above.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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From: Jessica Fernandez
Sent: Tuesday, May 08, 2018 12:29 PM
To: 'Maignan, Tawanda'; 'Johnson, Hope'; 'Johnson, Marion'; 'Giles-Parker, Cynthia'
Cc: 'John.Inouye@cdpr.ca.gov'; Danyel Ward; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you have received any communication back from ChemSAC on the Pyrimethanil rationale we submitted (referenced below).

Thanks!

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
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From: Jessica Fernandez
Sent: Tuesday, March 27, 2018 3:23 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thanks Tawanda.

Freundliche Grüße / Best regards,

Jessica Fernandez
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From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Tuesday, March 27, 2018 3:23 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I have not received any feedback at the moment and I do apologize for the delay. A message has been sent to ChemSac's attention inquiring on the status. Once I learn more I will let you know.

Thank you for your patience.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
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1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

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Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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From: Jessica Fernandez
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To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and

provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia

Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Registrations
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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
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christine.villegas@bayer.com

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Message

From: Groce, Stacey [Groce.Stacey@epa.gov]
Sent: 2/11/2016 5:41:29 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Voluntary Cancellation of Topramezone - SLN NC-150006

Good News!

From: Judy H Fersch [mailto:judy.fersch@basf.com]
Sent: Thursday, February 11, 2016 12:10 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Hey Stacey,

I will get you a letter by tomorrow afternoon, hopefully even this afternoon !

Thanks for the email,

Take Care,

Judy

Judy Fersch
State Registration Manager

Phone: 919 547-2258 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2880 E-Mail: judy.fersch@basf.com
Postal Address: BASF Corporation, Research Triangle Park, 27709 Research Triangle Park, USA

150 years
BASF - We create chemistry

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 11, 2016 11:16 AM
To: Judy H Fersch <judy.fersch@basf.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Voluntary Cancellation of Topramezone - SLN NC-150006

Hi Judy,

To formally close-out this withdrawn action, please email a voluntary cancellation letter in order to begin the administrative process, which concludes with a publication in the Federal Register.

It is my understanding based on an e-mail from Lee Davis of the North Carolina Department of Agriculture that BASF has withdrawn SLN NC150006. Please let me know at your earliest convenience if BASF as the regulatory lead, no longer supports this state registration and discuss the rationale for cancellation.

Also, let me know if, in making this voluntary cancellation request, BASF expressly waives the 180-day comment period provided under **FIFRA section 6(f)(1)(C)**. Accordingly, EPA will provide a 30-day comment period.

Thank you and call or email if you have any questions.

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

Message

From: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Sent: 2/10/2016 8:14:22 PM
To: Johnson, Marion [Johnson.Marion@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Larry Zang [larry.zang@syngenta.com]
Subject: Colorado notification of new SLN approval. Gramoxone SL 2.0, CO-160002
Attachments: 100-1431_GramoxoneSL2.0_L1E-1115_Label.pdf; Gramoxone SLN package to EPA CO-160002.pdf

Tawanda,

Attached is the notification of a new Colorado SLN approval:

- **CO-160002. Gramoxone SL 2.0 (EPA reg. No. 100-1431).** For use on alfalfa grown for seed for use as a harvest aide.

Active ingredient = paraquat dibromide

Date issued: February 9, 2016.

Expiration date: Label expires December 31, 2021 but may be renewed/extended.

We will also be mailing via fed ex.

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

Message

From: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Sent: 2/26/2016 8:27:02 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Rate, Debra [Rate.Debra@epa.gov]
Subject: Re: Chlorpyrifos SLNs -CO-100004 and CO-080008
Attachments: removed.txt

Tawanda, do I need to fedex this in as a letter, or is this email sufficient?

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

On Wed, Feb 17, 2016 at 5:55 AM, Rate, Debra <Rate.Debra@epa.gov> wrote:

Hi, Laura-

Thank you for getting the labels updated. Since Tawanda is back as the team lead, I will let her decide if she wants you to submit them through FedEx, as well.

Thanks again for your work in getting the updates.

Debra

From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Tuesday, February 16, 2016 5:29 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Fwd: Chlorpyrifos SLNs -CO-100004 and CO-080008

Debra,

After discussion and a request from me, Dow AgroSciences has revised their SLN labels for their two Colorado SLN's for Lorsban Advanced to provide an expiration date adding

"or until otherwise amended, withdrawn, cancelled or suspended."

The expiration dates are:

CO-080008: December 31, 2019

CO-100004: December 31, 2020.

The two revised labels are attached.

Is this email sufficient, or do I need to send a letter and the revised labels via fed ex as well??

Laura Quakenbush, Ph.D.

Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860

305 Interlocken Parkway, Broomfield, CO 80021

laura.quakenbush@state.co.us | www.colorado.gov/ag

---------- Forwarded message ----------
From: **Shears, Kristen (K)** <kshears@dow.com>

Date: Tue, Feb 16, 2016 at 10:38 AM
Subject: Chlorpyrifos SLNs -CO-100004 and CO-080008
To: "laura.quakenbush@state.co.us" <laura.quakenbush@state.co.us>

Laura:

I do apologize for the delay on these. Attached please find the above referenced updated SLNs

Best,

Kristen Shears Regulatory Specialist
Office: 317.337.4791 kshears@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

www.dowagro.com | Facebook | Twitter | YouTube

Dow AgroSciences

Solutions for the Growing World

Message

From: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
Sent: 2/16/2016 10:29:05 PM
To: Rate, Debra [Rate.Debra@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Fwd: Chlorpyrifos SLNs -CO-100004 and CO-080008
Attachments: R368-102 Lorsban Advanced Sec 24c CO-080008 Grape 16Feb16f.pdf; R368-108 Lorsban Advanced Sec 24c CO-100004 Corn 16Feb16d.pdf

Debra,

After discussion and a request from me, Dow AgroSciences has revised their SLN labels for their two Colorado SLN's for Lorsban Advanced to provide an expiration date adding

"or until otherwise amended, withdrawn, cancelled or suspended."

The expiration dates are:

CO-080008: December 31, 2019
CO-100004: December 31, 2020.

The two revised labels are attached.

Is this email sufficient, or do I need to send a letter and the revised labels via fed ex as well??

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

---------- Forwarded message ----------
From: **Shears, Kristen (K)** <kshears@dow.com>
Date: Tue, Feb 16, 2016 at 10:38 AM
Subject: Chlorpyrifos SLNs -CO-100004 and CO-080008
To: "laura.quakenbush@state.co.us" <laura.quakenbush@state.co.us>

Laura:

I do apologize for the delay on these. Attached please find the above referenced updated SLNs

Best,

Kristen Shears Regulatory Specialist
Office: 317.337.4791 kshears@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

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Dow AgroSciences

Solutions for the Growing World

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:40:01 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rick.boydston@ars.usda.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-960014
Attachments: 100-620_Caparol 4L_20160121_WA-960014_100-1_.pdf; WA-960014_Caparol 4L_20160121.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-960014 to Syngenta Crop Protection Inc for use of Caparol 4L Herbicide (EPA Reg. No. 100-620) to control weeds in seed carrot, seed parsley, seed parsnip and seed dill. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:43:59 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rick.boydston@ars.usda.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-960014
Attachments: 100-1295_Warrior II with Zeon Technology_20160121_WA-100002_100-2_.pdf; WA-100002_Warrior II with Zeon Technology_20160121.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-100002 to Syngenta Crop Protection Inc for use of Warrior II with Zeon Technology (EPA Reg. No. 100-1295) to control lygus bugs on dill, carrot, parsley and parsnip grown for seed. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:46:24 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rick.boydston@ars.usda.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-040007
Attachments: 100-1070_Fusilade DX Herbicide_20160121_WA-040007_100-1_.pdf; WA-040007_Fusilade DX_20151208.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-040007 to Syngenta Crop Protection Inc for use of Fusilade DX Herbicide (EPA Reg. No. 100-1070) to control annual and perennial grassy weeds, including Quackgrass, in alfalfa grown for seed. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:50:32 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; dutoit@wsu.edu; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-950036
Attachments: 50534-188_Bravo WeatherStik Agricultural Fungicide_20160121_WA-950036.pdf; WA-950036_Bravo WeatherStik Agricultural Fungicide_20160121.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-950036b to GB BioSciences Corporation for use of Bravo WeatherStik (EPA Reg. No. 50534-188) to control weeds in dry bulb onions. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Groce, Stacey [Groce.Stacey@epa.gov]
Sent: 2/11/2016 8:06:15 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Voluntary Cancellation of Topramezone - SLN NC-150006
Attachments: BASF topramezon withdrawal letter.pdf

FYI!

From: Judy H Fersch [mailto:judy.fersch@basf.com]
Sent: Thursday, February 11, 2016 2:58 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Hey Stacey,

I've attached the letter for you, check and make sure it's what you need – I'll be happy to change if you need me to !

Take Care,

Judy

Judy Fersch
State Registration Manager

Phone: 919 547-2258 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2880 E-Mail: judy.fersch@basf.com
Postal Address: BASF Corporation, Research Triangle Park, 27709 Research Triangle Park, USA

150 years
BASF - We create chemistry

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 11, 2016 12:17 PM
To: Judy H Fersch <judy.fersch@basf.com>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Thank you Judy .. very much appreciated!!

Stacey

From: Judy H Fersch [mailto:judy.fersch@basf.com]
Sent: Thursday, February 11, 2016 12:10 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Hey Stacey,

I will get you a letter by tomorrow afternoon, hopefully even this afternoon !

Thanks for the email,

Take Care,

Judy

Judy Fersch
State Registration Manager

Phone: 919 547-2258 Mobile: Personal Phone / Ex. 6 Fax: 919 547-2880 E-Mail: judy.fersch@basf.com
Postal Address: BASF Corporation, Research Triangle Park, 27709 Research Triangle Park, USA

150 years
BASF - We create chemistry

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 11, 2016 11:16 AM
To: Judy H Fersch <judy.fersch@basf.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Voluntary Cancellation of Topramezone - SLN NC-150006

Hi Judy,

To formally close-out this withdrawn action, please email a voluntary cancellation letter in order to begin the administrative process, which concludes with a publication in the Federal Register.

It is my understanding based on an e-mail from Lee Davis of the North Carolina Department of Agriculture that BASF has withdrawn SLN NC150006. Please let me know at your earliest convenience if BASF as the regulatory lead, no longer supports this state registration and discuss the rationale for cancellation.

Also, let me know if, in making this voluntary cancellation request, BASF expressly waives the 180-day comment period provided under **FIFRA section 6(f)(1)(C)**. Accordingly, EPA will provide a 30-day comment period.

Thank you and call or email if you have any questions.

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:53:27 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; dutoit@wsu.edu; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-950036b
Attachments: 50534-188-100_Bravo WeatherStik Agr_20160121_WA-950036b_100-2_.pdf; WA-950036B_Bravo WeatherStik Agricultural Fungicide_20160121.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-950036b to Syngenta Crop Protection Inc for use of Bravo WeatherStik (EPA Reg. No. 50534-188-100) to control weeds in dry bulb onions. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 10:09:59 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; twmiller@wsu.edu; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-040006

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-040006 to Syngenta Crop Protection Inc for use of Fusilade DX Herbicide (EPA Reg. No. 100-1070) to control grassy weeds in listed vegetable crops grown for seed. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Dutoit, Lindsey J [dutoit@wsu.edu]
Sent: 1/28/2016 10:44:23 PM
To: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: RE: Washington Revised SLN WA-950036b

Hello Shannon:

Hello Shannon:

Thank you for the information on this SLN renewal. I was rather surprised to read the email refers to Bravo Weatherstik as controlling weeds in onion crops, because this product is a fungicide, not a herbicide, and the label you sent is for control of several leaf spot fungal pathogens in spinach and Swiss chard seed crops, not onion bulb crops. The WSDA letter refers to weed control in onion bulb crops, which doesn't actually fit the label you sent. Would you please clarify this situation, as Bravo is never recommended for weed control in any crops?

Thank you,
Lindsey

Lindsey J. du Toit
Department of Plant Pathology
Washington State University Mount Vernon NWREC
16650 State Route 536
Mount Vernon, WA 98273-4768, USA
Tel: (360) 848-6140
Cell: (Personal Phone / Ex. 6
Fax: (360) 848-6159

From: Lumsden, Shannon (AGR) [mailto:SLumsden@agr.wa.gov]
Sent: Thursday, January 28, 2016 1:53 PM
To: maignan.tawanda@epa.gov
Cc: susan.person@syngenta.com; Jones, Lenora J <lenora.jones@wsu.edu>; ben.miller@agri.idaho.gov; Dutoit, Lindsey J <dutoit@wsu.edu>; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-950036b

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-950036b to Syngenta Crop Protection Inc for use of Bravo WeatherStik (EPA Reg. No. 50534-188-100) to control weeds in dry bulb onions. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Dutoit, Lindsey J [dutoit@wsu.edu]
Sent: 1/28/2016 10:46:49 PM
To: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: RE: Washington Revised SLN WA-950036

Hello Shannon:

As I stated in an earlier email about a related registration, would you please clarify why the letter and email state this fungicide is approved for use in onion bulb crops for weed control, when the SLN label is for fungal leaf spot diseases in spinach and chard seed crops. This fungicide is never used for weed control in any crops, only as a fungicide.

Thank you,
Lindsey

Lindsey J. du Toit
Department of Plant Pathology
Washington State University Mount Vernon NWREC
16650 State Route 536
Mount Vernon, WA 98273-4768, USA
Tel: (360) 848-6140
Cell: Personal Phone / Ex. 6
Fax: (360) 848-6159

From: Lumsden, Shannon (AGR) [mailto:SLumsden@agr.wa.gov]
Sent: Thursday, January 28, 2016 1:51 PM
To: maignan.tawanda@epa.gov
Cc: susan.person@syngenta.com; Jones, Lenora J <lenora.jones@wsu.edu>; ben.miller@agri.idaho.gov; Dutoit, Lindsey J <dutoit@wsu.edu>; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-950036

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-950036b to GB BioSciences Corporation for use of Bravo WeatherStik (EPA Reg. No. 50534-188) to control weeds in dry bulb onions. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 11:11:58 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Corrected SLN Cover Letters for WA-950036 and 950036B
Attachments: WA-950036_Bravo WeatherStik Agricultural Fungicide_20160121.pdf; WA-950036B_Bravo WeatherStik Agricultural Fungicide_20160121.pdf

Sorry there were errors on both of the cover letters for Bravo WeatherStik. That has been corrected with these copies. Please toss the previous ones sent.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:30:47 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rick.boydston@ars.usda.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-990023
Attachments: 100-816_Dual Magnum_20160121_WA-990023_100-1_.pdf; WA-990023_Dual Magnum_20160121.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-090023to Syngenta Crop Protection Inc for use of Dual Magnum Herbicide (EPA Reg. No. 100-816) to control weeds in dry bulb onions. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/28/2016 9:24:34 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: susan.person@syngenta.com; Jones, Lenora J [lenora.jones@wsu.edu]; ben.miller@agri.idaho.gov; rick.boydston@ars.wa.gov; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov
Subject: Washington Revised SLN WA-040024
Attachments: 100-1070_Fusilade DX Herbicide_20151214_WA-040024_100-1_.pdf; WA-040024_Fusilade DX Herbicide_20160125.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-040024 to Syngenta Crop Protection Inc for use of Fusilade DX Herbicide (EPA Reg. No. 100-1070) to control weeds in fine fescue grasses grown for seed. This registration was issued under authority of Section 24(c) FIFRA. The expiration date statement was extended to December 31, 2020.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Rate, Debra [Rate.Debra@epa.gov]
Sent: 1/27/2016 5:41:41 PM
To: Zang Larry USGR [larry.zang@syngenta.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Syngenta SLN SC-120003- missing on 2016 EPA Maintenance Report

Hi, Larry-

Thank you first for your take on the SLN and minor crops. I will take that back to the team to see what they think. I can't promise which way the result will fall, but will let you know.

On the topic of SLN SC-120003, I do not see any record of that SLN actually making it to the Agency. The process is that the SLNs are sent through the Front End and the information is entered into the database and then a file is created (physical folder) and delivered to the Team for review. There is no record with that SLN in our database.

Do you know if you or the state received any correspondence from the Agency on that SLN? (usually a letter is sent to the state acknowledging the receipt of the application; then an acknowledgement letter from the team once the label/use has been reviewed)

I'm copying Tawanda on this email, since she will be the one seeing this SLN, when it comes back into the Agency. Presumably, the state is using this SLN? Looking at the label, we will need to have adjustments made to the label (skull and cross-bones / poison warnings) based on the active ingredient. I would think they could use the same SLN number, since it is already in use. However, the Agency will need to be able to do a review of the use pattern/label and application. I'm not sure of the best way to get it into the system, whether to have the state resubmit the previous paperwork? (Tawanda, how would you like to handle this?)

Will let you know the best path forward, soon.
Debra

From: Zang Larry USGR [mailto:larry.zang@syngenta.com]
Sent: Wednesday, January 27, 2016 12:08 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Subject: RE: Syngenta SLN SC-120003- missing on 2016 EPA Maintenance Report

Hi Debra,

In my experience, the multi-crop SLN's are almost exclusively associated with minor crops . I can't think of a Syngenta SLN that has two major crops on one SLN
for instance. The great majority of the SLN's we have are associated with minor crops.

From my perspective, the revision of the EPA crop group tables which greatly expanded the number of crops covered by a single crop group tolerance, and the consumer demand for a wider wider variety of vegetable crops has lead to an increased number of requests for minor crop SLN's.

From an administrative side, there is no work saving on our end to amend an existing SLN, we still provide the state same documentation as for a new SLN. However, singcle crop SLN's for each crop/pest combination would result in an unmanageable number of SLN's at the registrant level. The resource commitment to maintain and renew them as needed would be substantial.

I can't speak for states, but my impression is that if single crops SLN's for minor crops were required for all crop /pest combinations it would be an overwhelming administrative burden as well.

I'd be glad to discuss this more with you if you like.

Thank you for taking the time to review the SLN documentation we are sending . I have a few others to send and am working with the states to get the documentation on them.

Regard, Larry

From: Rate, Debra [mailto:Rate.Debra@epa.gov]
Sent: Tuesday, January 26, 2016 3:33 PM
To: Zang Larry USGR
Subject: Re: Syngenta SLN SC-120003- missing on 2016 EPA Maintenance Report

Hi, Larry-

I will look into this issue when they let me back into the office.

But I have a slightly different question in relation to SLNs. Your company recently asked for an amendment to an SLN (OR040010) to add additional crops and use directions. Although we haven't always been consistent across the board in the past, we are trying to keep SLNs simple (one crop/ one pest). Why didn't you apply for two new SLNs? Is there a huge amount of work eliminated by trying to make it an amendment?

Curious to know. Will look into the other SLNs tomorrow (hopefully).
Debra

Sent from my iPhone

On Jan 25, 2016, at 10:49 AM, Zang Larry USGR <larry.zang@syngenta.com> wrote:

> Hi Debra,
>
> We noticed SLN SC-120003 , Gramoxone SL 2.0 for Suppression and/or Control of Palmer Amaranth in Peanut, was not listed on the 2016 EPA Maintenance Fee Report for Syngenta. We contacted Mick Yanchulis in the EPA Information Services Branch. He indicated it was not in his database and suggested we contact you.
>
> Based on our conversation last week, attached is documentation we received from Dr. Tim Drake at Clemson University dated May 4, 2012 indicating the approval and notification to EPA. The signed EPA 8570-25 from Dr. Drake is also attached.
>
> After your review, please let us know what the next steps are to have this added to the EPA Maintenance Report.
>
> Thanks, Larry
>
> Larry Zang
> Senior Regulatory Product Manager

North America

Syngenta
410 Swing Road
Greensboro, NC 27409
USA

phone +1 336-632-2146
cell +[redacted]
fax +1 336-632-2884

larry.zang@syngenta.com
www.syngenta.com

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<SCGramoxoneSL2.0PeanutSLNStateApproval_5-4-12.pdf>

<SC1431024AA0512.pdf>

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Shepler, Courtney (AGR) [CShepler@agr.wa.gov]
Sent: 1/26/2016 11:22:37 PM
To: Alan Schreiber [aschreib@centurytel.net]; Catherine H Daniels [cdaniels@wsu.edu]; David Priebe [dpriebe@oda.state.or.us]; Lenora Jones [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Alan Schreiber [aschreib@centurytel.net]; Ben Miller [ben.miller@agri.idaho.gov]; David Priebe [dpriebe@oda.state.or.us]; Doug Walsh [dwalsh@wsu.edu]; Joe Herrera [jherrera@yakama.com]; John Inouye [jinouye@cdpr.ca.gov]; susan.person@syngenta.com; cwohleb@wsu.edu; rkachadorian@oda.state.or.us
Subject: Revised SLN for WA-000017 Fulfill Insecticide to control aphids on vegetable seed crop
Attachments: WA-000017_Corres_20160121.pdf; 100-912_Fulfill Insecticide_20160121_WA-000017_100-1.pdf

Attached please find the letter to EPA and revised label:

Courtney Shepler
Registration and Licensing Services
Pesticide Management Division
P: (360) 902-2025
cshepler@agr.wa.gov
Washington State Department of Agriculture

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 2/26/2016 8:55:31 PM
To: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]
CC: Rate, Debra [Rate.Debra@epa.gov]
Subject: RE: Chlorpyrifos SLNs -CO-100004 and CO-080008

Laura,
Since these are revisions, the email is sufficient. Thanks for following up.

Regards,
Tawanda

From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Friday, February 26, 2016 3:27 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Rate, Debra <Rate.Debra@epa.gov>
Subject: Re: Chlorpyrifos SLNs -CO-100004 and CO-080008

Tawanda, do I need to fedex this in as a letter, or is this email sufficient?

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

On Wed, Feb 17, 2016 at 5:55 AM, Rate, Debra <Rate.Debra@epa.gov> wrote:

Hi, Laura-

Thank you for getting the labels updated. Since Tawanda is back as the team lead, I will let her decide if she wants you to submit them through FedEx, as well.

Thanks again for your work in getting the updates.

Debra

From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Tuesday, February 16, 2016 5:29 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Fwd: Chlorpyrifos SLNs -CO-100004 and CO-080008

Debra,

After discussion and a request from me, Dow AgroSciences has revised their SLN labels for their two Colorado SLN's for Lorsban Advanced to provide an expiration date adding

"or until otherwise amended, withdrawn, cancelled or suspended."

The expiration dates are:

CO-080008: December 31, 2019

CO-100004: December 31, 2020.

The two revised labels are attached.

Is this email sufficient, or do I need to send a letter and the revised labels via fed ex as well??

Laura Quakenbush, Ph.D.

Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860

305 Interlocken Parkway, Broomfield, CO 80021

laura.quakenbush@state.co.us | www.colorado.gov/ag

---------- Forwarded message ----------
From: **Shears, Kristen (K)** <kshears@dow.com>
Date: Tue, Feb 16, 2016 at 10:38 AM
Subject: Chlorpyrifos SLNs -CO-100004 and CO-080008
To: "laura.quakenbush@state.co.us" <laura.quakenbush@state.co.us>

Laura:

I do apologize for the delay on these. Attached please find the above referenced updated SLNs

Best,

Kristen Shears Regulatory Specialist
Office: 317.337.4791 kshears@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

www.dowagro.com | Facebook | Twitter | YouTube

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 2/10/2016 9:15:47 PM
To: Quakenbush - CDA, Laura [laura.quakenbush@state.co.us]; Johnson, Marion [Johnson.Marion@epa.gov]
CC: Larry Zang [larry.zang@syngenta.com]
Subject: RE: Colorado notification of new SLN approval. Gramoxone SL 2.0, CO-160002

Laura – Happy New Year! Thanks for the notifications.

From: Quakenbush - CDA, Laura [mailto:laura.quakenbush@state.co.us]
Sent: Wednesday, February 10, 2016 3:14 PM
To: Johnson, Marion <Johnson.Marion@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Larry Zang <larry.zang@syngenta.com>
Subject: Colorado notification of new SLN approval. Gramoxone SL 2.0, CO-160002

Tawanda,

Attached is the notification of a new Colorado SLN approval:

- **CO-160002. Gramoxone SL 2.0 (EPA reg. No. 100-1431).** For use on alfalfa grown for seed for use as a harvest aide.

Active ingredient = paraquat dibromide

Date issued: February 9, 2016.

Expiration date: Label expires December 31, 2021 but may be renewed/extended.

We will also be mailing via fed ex.

Laura Quakenbush, Ph.D.
Pesticide Registration Coordinator

P 303.869.9060 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
laura.quakenbush@state.co.us | www.colorado.gov/ag

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 1/27/2016 2:53:15 PM
To: Shepler, Courtney (AGR) [CShepler@agr.wa.gov]
CC: Alan Schreiber [aschreib@centurytel.net]; Catherine H Daniels [cdaniels@wsu.edu]; David Priebe [dpriebe@oda.state.or.us]; Lenora Jones [lenora.jones@wsu.edu]; Ben Miller [ben.miller@agri.idaho.gov]; Doug Walsh [dwalsh@wsu.edu]; Joe Herrera [jherrera@yakama.com]; John Inouye [jinouye@cdpr.ca.gov]; susan.person@syngenta.com; cwohleb@wsu.edu; rkachadorian@oda.state.or.us
Subject: Re: Revised SLN for WA-000017 Fulfill Insecticide to control aphids on vegetable seed crop

Good morning Courtney,
Please submit this request via U.S. Postal services or courier for proper processing. Unfortunately, we do not accept SLNs via email.
Many thanks,

Tawanda Maignan
EPA/OCSPP/OPP/RD
(703) 308-8050

On Jan 26, 2016, at 6:22 PM, Shepler, Courtney (AGR) <CShepler@agr.wa.gov> wrote:

> Attached please find the letter to EPA and revised label:
>
> Courtney Shepler
> Registration and Licensing Services
> Pesticide Management Division
> P: (360) 902-2025
> cshepler@agr.wa.gov
> <image002.png>
>
> <WA-000017_Corres_20160121.pdf>
> <100-912_Fulfill Insecticide_20160121_WA-000017_100-1.pdf>

Message

From: Arrington, Linda [Arrington.Linda@epa.gov]
Sent: 10/10/2018 9:27:21 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Davis, Kable [Davis.Kable@epa.gov]; Fitz, Nancy [Fitz.Nancy@epa.gov]
Subject: RE: Bentazon SLN labels

Thanks it does.

Linda Arrington, Branch Chief
RMIB 4
Pesticide Re-evaluation Division
Office 703 305 6249
Fax 703 308 8005

From: Maignan, Tawanda
Sent: Wednesday, October 10, 2018 5:04 PM
To: Arrington, Linda <Arrington.Linda@epa.gov>
Cc: Davis, Kable <Davis.Kable@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: RE: Bentazon SLN labels

Hi Linda –

Deliberative Process / Ex. 5

I hope this helps.

Tawanda

Tawanda Maignan
Emergency Response Team Leader
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Arrington, Linda
Sent: Wednesday, October 10, 2018 10:53 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Bentazon SLN labels

Hi Tawanda,

Please see the email below and let me know if you agree with him. I know that we have talked about this before, but is this SNL different from the others?

Thanks

Linda Arrington, Branch Chief
RMIB 4
Pesticide Re-evaluation Division
Office 703 305 6249
Fax 703 308 8005

From: Craig D Kleppe [mailto:craig.kleppe@basf.com]
Sent: Monday, July 23, 2018 11:27 AM
To: Appleyard, Moana <Appleyard.Moana@epa.gov>
Subject: RE: Bentazon SLN labels

Moana,

I did not submit SLN labels for Bentazon because all but ID170001 have either expired or were cancelled.

The SLN ID170001 is for Varisto Herbicide, EPA Reg.No. 241-447, which contains bentazon and is for use in clover grown for seed in ID. Since all SLN labels require the applicator to have the main product container in their possession at time of application, we shouldn't need to amend the SLN with all the spray drift management and resistance management changes. I think the only change to the ID1701 label is to update the resistance banner at top right corner of label (see attached).

Regards
Craig Kleppe
Product Registration Manager

Phone: +1 919 547-2615, Mobile Personal Phone / Ex. 6 Email: craig.kleppe@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, Research Triangle Park, North Carolina, 27709-3528 , United States

BASF
We create chemistry

From: Appleyard, Moana [mailto:Appleyard.Moana@epa.gov]
Sent: Monday, July 23, 2018 9:10 AM
To: Craig D Kleppe <craig.kleppe@basf.com>
Subject: Bentazon SLN labels

Good morning Craige,

I hope you are well. I went over the bentazon label submissions and could not locate submissions for the SLNs. If you have submitted the labels, could you send me a receipt of their submission? If you have not submitted them, please submit the following labels through the portal as soon as possible. Thank you so much!

ID170001

ID960008
MT960001
OR950033
WA900012

Best Regards,

Moana

Moana R. Appleyard
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
Telephone: (703) 308-8175
Fax: (703) 308-8005
appleyard.moana@epa.gov

Mailing Address:
1200 Pennsylvania Ave NW, (7508P)
Washington DC 20460
Delivery Only:
One Potomac Yard (South Building)
2777 S. Crystal Drive Arlington, VA 22202

Message

From: Arrington, Linda [Arrington.Linda@epa.gov]
Sent: 10/10/2018 2:52:49 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Bentazon SLN labels
Attachments: Varisto NVA 2017-04-480-0027 clover 04-03-2017b_24c ID.PDF

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Linda Arrington, Branch Chief
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Craig Kleppe
Product Registration Manager

Phone: +1 919 547-2615, Mobile: Personal Phone / Ex. 6 Email: craig.kleppe@basf.com
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Mailing Address:
1200 Pennsylvania Ave NW, (7508P)
Washington DC 20460
Delivery Only:
One Potomac Yard (South Building)
2777 S. Crystal Drive Arlington, VA 22202

Message

From: SEIFERT-HIGGINS, SIMONE [AG/1005] [simone.seifert-higgins@monsanto.com]
Sent: 7/20/2018 12:15:09 PM
To: jpeterson@azda.gov; CALLEN, STEVEN THOMAS [AG/1005] [steven.thomas.callen@monsanto.com]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: SCHMIDT, THOMAS MARK [AG/1005] [thomas.mark.schmidt@monsanto.com]
Subject: RE: AZ SLN 180002 for M1840 PGR

Thank you Jack!

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Thursday, July 19, 2018 12:28 PM
To: CALLEN, STEVEN THOMAS [AG/1005] <steven.thomas.callen@monsanto.com>; SEIFERT-HIGGINS, SIMONE [AG/1005] <simone.seifert-higgins@monsanto.com>; Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
Cc: SCHMIDT, THOMAS MARK [AG/1005] <thomas.mark.schmidt@monsanto.com>
Subject: RE: AZ SLN 180002 for M1840 PGR

Well hopefully the 3rd time is the charm. I am so sorry.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: CALLEN, STEVEN THOMAS [AG/1005] [mailto:steven.thomas.callen@monsanto.com]
Sent: Thursday, July 19, 2018 10:12 AM
To: Jack Peterson <jpeterson@azda.gov>; SEIFERT-HIGGINS, SIMONE [AG/1005] <simone.seifert-higgins@monsanto.com>; Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
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Steven

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To: SEIFERT-HIGGINS, SIMONE [AG/1005] <simone.seifert-higgins@monsanto.com>; Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
Cc: SCHMIDT, THOMAS MARK [AG/1005] <thomas.mark.schmidt@monsanto.com>; CALLEN, STEVEN THOMAS [AG/1005] <steven.thomas.callen@monsanto.com>
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Cc: SCHMIDT, THOMAS MARK [AG/1005] <thomas.mark.schmidt@monsanto.com>; CALLEN, STEVEN THOMAS [AG/1005] <steven.thomas.callen@monsanto.com>
Subject: RE: AZ SLN 180002 for M1840 PGR
Importance: High

Hi Jack,
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Regards,
Simone

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Thursday, July 19, 2018 11:34 AM
To: Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
Cc: SCHMIDT, THOMAS MARK [AG/1005] <thomas.mark.schmidt@monsanto.com>; CALLEN, STEVEN THOMAS [AG/1005] <steven.thomas.callen@monsanto.com>; SEIFERT-HIGGINS, SIMONE [AG/1005] <simone.seifert-higgins@monsanto.com>
Subject: AZ SLN 180002 for M1840 PGR

This is going out in the mail today.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
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Message

From: CALLEN, STEVEN THOMAS [AG/1005] [steven.thomas.callen@monsanto.com]
Sent: 7/19/2018 5:34:26 PM
To: jpeterson@azda.gov; SEIFERT-HIGGINS, SIMONE [AG/1005] [simone.seifert-higgins@monsanto.com]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: SCHMIDT, THOMAS MARK [AG/1005] [thomas.mark.schmidt@monsanto.com]
Subject: RE: AZ SLN 180002 for M1840 PGR

Thanks so much, Jack! Looks good to me!

Have a great rest of your week!
Steven

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Thursday, July 19, 2018 12:28 PM
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CC: SCHMIDT, THOMAS MARK [AG/1005] [thomas.mark.schmidt@monsanto.com]
Subject: RE: AZ SLN 180002 for M1840 PGR
Attachments: 20180719102901360.pdf

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Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
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602-542-3575

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From: SEIFERT-HIGGINS, SIMONE [AG/1005] [simone.seifert-higgins@monsanto.com]
Sent: 7/19/2018 4:39:28 PM
To: jpeterson@azda.gov; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: SCHMIDT, THOMAS MARK [AG/1005] [thomas.mark.schmidt@monsanto.com]; CALLEN, STEVEN THOMAS [AG/1005] [steven.thomas.callen@monsanto.com]
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Message

From: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Sent: 4/25/2018 7:00:38 PM
To: jpeterson@azda.gov; Cain, Tamica [Cain.Tamica@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hello Jack --

Thank you for this document and the other e-mail that contained the sorghum exemption documents. We'll get back to you within a few days if we have any questions or concerns.

Sincerely, Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Wednesday, April 25, 2018 11:42 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Here is the revised cotton label which falls in line with last year. Sorry about that.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:52 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; bibret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Hi Jack --

Seems I wrote my last e-mail a bit too quickly – we just realized that the attachment you sent does not contain the use directions for these Section 18s and a supporting letter from the registrant. Can you please e-mail those as well?

Thanks and please let us know if you have any questions for us - Nik

---

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 11:31 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; bibret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 7:19 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Thanks for the explanation – we'll use the ones you've e-mailed yesterday since you indicated that there were also some errors that were corrected.

For Section 18s, the electronic (e-mailed) versions are sufficient for us. At this time, SLN (24(c)) documents still just ***only*** be mailed in paper form to the OPP Front desk for appropriate in-processing to begin.

Regards, Nik

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 17, 2018 10:06 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

That is so weird as the packages we mailed in were returned to us. Therefore, we sent them again yesterday and I emailed them to you. There were some math errors in the first ones so one part was changed - 166.32(b)(1) in both packages. The other ones I emailed in were not acknowledged so I believed the only ones that count are the ones that we mail in – which unfortunately were returned due to a bad address.

Thank you for your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM

To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

*Address for FedEx, UPS, DHL, Courier deliveries **ONLY***

U.S. EPA Office of Pesticide Programs
Document Processing Desk (SLN)
U.S. Environmental Protection Agency
2777 Crystal Drive
Arlington, VA 22202

*Address for U.S. Postal Service deliveries **ONLY***
Document Processing Desk (SLN)
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

I hope this addresses your question sufficiently. If not, or if you have additional questions, please don't hesitate to contact me.

Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 4/23/2018 3:07:40 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Daniels, Catherine Hollinger [cdaniels@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; Rose Kachadoorian [rkachadoorian@oda.state.or.us]; jinouye@cdpr.ca.gov; sherm.takatori@agri.idaho.gov; Dinnen Pat USGR [pat.dinnen@syngenta.com]; Wohleb, Carrie Huffman [cwohleb@wsu.edu]
Subject: WA-130009 Revised Label Issued to Syngenta Crop Protection
Attachments: WA-130009 Actara Label Revision_Extension.pdf; WA_ActaraSugarbeetSeedSLNLbl_08-22-17.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-130009 to Syngenta Crop Protection for use of Actara (EPA Reg. No. 100-938) for control of green peach aphid on sugar beet grown for seed. The expiration date statement was extended to December 31, 2022.

Message

From: Simons, Eddie (AGR) [ESimons@agr.wa.gov]
Sent: 5/29/2018 5:14:06 PM
To: Daniels, Catherine Hollinger [cdaniels@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Alan Schreiber [aschreib@centurytel.net]; Doug Walsh [dwalsh@wsu.edu]; Grant Jackson (gjackson@oda.state.or.us) [gjackson@oda.state.or.us]; Joe Herrera [jherrera@yakama.com]; John Inouye [jinouye@cdpr.ca.gov]; Sherman (Sherm) Takatori (sherman.takatori@isda.idaho.gov) [sherman.takatori@isda.idaho.gov]; Mary Fryczynski [mary.fryczynski@basf.com]; twaters@wsu.edu
Subject: Revised WA-070004 to BASF Corporation for delayed preemergence treatment of Prowl H2O Herbicide (241-418) in dry bulb onions.
Attachments: WA-070004_Apprvl_20180529.pdf; 241-418_Prowl H2O_20180529_WA-070004_7969_.PDF

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-070004 to BASF Corporation for use of Prowl H2O Herbicide (EPA Reg. 241-418) for weed control as a delayed preemergence treatment in dry bulb onions.

- **The expiration date statement was extended to December 31, 2022.**

Please contact me if you have any questions.

Regards,

Eddie Simons
Registration Specialist

Washington State Department of Agriculture
Pesticide Management Division
Phone: 360.902.2031
email: esimons@agr.wa.gov

Message

From: Dieter Harle [dieter@bestoptionsinc.com]
Sent: 4/5/2019 7:05:26 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Alyssa Foss [alyssa.foss@wisconsin.gov]; InfoAtDow [info@dow.com]; Vaughn Zuleger [vzuleger@glkfoods.com]; Dan Heider [djheider@wisc.edu]
Subject: Re: Goal Tender - Supplemental Label for Wisconsin Cabbage growers

Thank you for the clarification.
Dieter

On Fri, Apr 5, 2019, 14:03 Maignan, Tawanda <Maignan.Tawanda@epa.gov> wrote:

Dear Mr. Harle ---

As previously shared, FIFRA Section 24(c) registrations are approved by the State. EPA reviews the individual section 24(c) registrations and broadly oversees the states section 24(c) registration programs. That said, the States are responsible for registering pesticides to meet a special local need in accordance with section 24(c) of FIFRA.

I would also like to clarify that I did not offer guidance to reach out to FDA. I have been clear that you must work with the state and registrant for the product in which you are seeking to use.

Regards,

Tawanda

Tawanda Maignan

Emergency Response Team Leader

Minor Use & Emergency Response Branch

Registration Division | Office of Pesticide Programs

U.S. Environmental Protection Agency (7505P)

1200 Pennsylvania Avenue, NW | Washington, DC 20460

Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Dieter Harle <dieter@bestoptionsinc.com>
Sent: Friday, April 05, 2019 2:27 PM
To: Alyssa Foss <alyssa.foss@wisconsin.gov>; InfoAtDow <info@dow.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Vaughn Zuleger <vzuleger@glkfoods.com>; Dan Heider <djheider@wisc.edu>
Subject: Goal Tender - Supplemental Label for Wisconsin Cabbage growers

Hallo,

We are getting close for planting season and your help is very much appreciated for this special needs application!

In discussion with Corteva Agriscience , Agriculture Division of DowDuPont, LLC - Terri Moss and

Maignan Tawanda of the EPA in Washington, D.C. and the Wisconsin Department of Agriculture - DATCP - Alyssa Foss

we are attempting to get clearance for use in Wisconsin of the Goal Tender product for use in cabbage like in the attached Michigan State label.

In conversation with Maignan at the EPA it became apparent that the Michigan label has already another registration number from the original approval in 2008. This number mentioned to me on the phone is: 92894-3.

Maignan has told me that the DATCP needs to get in contact with the FDA. It was not clear to me if we have reached the proper place and contact yet.

She has indicated willingness to help to move this project along. She is being copied on this communication. Her phone number: 703-308-8050

We are doing this on behalf of the growers for GLK-Foods, Bear Creek, WI. 10 farms - approximately 3,000 acres of growing cabbage in northeast and east central Wisconsin. The farmers and their agronomists feel that the use of this product is very important for cost challenging production and competitiveness to other states.

Also copied is UWEX staff Dr. Dan Heider, 608-576-4135 and Vaughn Zuleger from GLK-Foods.

Please REPLY TO ALL - so we can hopefully work on this approval as speedy and in time for planting season!

THANK YOU!

Sincerely,

Dieter

Dieter Härle, Consultant

On Behalf of GLK-Foods c/o Vaughn Zuleger

2515 Pheasant Creek Circle

Davenport, IA 52807

Phone: 563.940.1440

www.BestOptionsInc.com

Message

From: Dieter Harle [dieter@bestoptionsinc.com]
Sent: 4/5/2019 6:27:20 PM
To: Alyssa Foss [alyssa.foss@wisconsin.gov]; InfoAtDow [info@dow.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Vaughn Zuleger [vzuleger@glkfoods.com]; Dan Heider [djheider@wisc.edu]
Subject: Goal Tender - Supplemental Label for Wisconsin Cabbage growers
Attachments: Microsoft Word - R204-080 GoalTender Sec 24c MI-090003 Broccoli Cauliflower Postemergence 29Apr14f.doc.pdf

Hallo,
We are getting close for planting season and your help is very much appreciated for this special needs application!
In discussion with Corteva Agriscience , Agriculture Division of DowDuPont, LLC - Terri Moss and Maignan Tawanda of the EPA in Washington, D.C. and the Wisconsin Department of Agriculture - DATCP - Alyssa Foss
we are attempting to get clearance for use in Wisconsin of the Goal Tender product for use in cabbage like in the attached Michigan State label.
In conversation with Maignan at the EPA it became apparent that the Michigan label has already another registration number from the original approval in 2008. This number mentioned to me on the phone is: 92894-3.

Maignan has told me that the DATCP needs to get in contact with the FDA. It was not clear to me if we have reached the proper place and contact yet.
She has indicated willingness to help to move this project along. She is being copied on this communication.
Her phone number: 703-308-8050

We are doing this on behalf of the growers for GLK-Foods, Bear Creek, WI. 10 farms - approximately 3,000 acres of growing cabbage in northeast and east central Wisconsin. The farmers and their agronomists feel that the use of this product is very important for cost challenging production and competitiveness to other states.

Also copied is UWEX staff Dr. Dan Heider, 608-576-4135 and Vaughn Zuleger from GLK-Foods.

Please REPLY TO ALL - so we can hopefully work on this approval as speedy and in time for planting season!
THANK YOU!
Sincerely,
Dieter

Dieter Härle, Consultant
On Behalf of GLK-Foods c/o Vaughn Zuleger
2515 Pheasant Creek Circle
Davenport, IA 52807

Phone: 563.940.1440

www.BestOptionsInc.com

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 9/5/2018 7:04:22 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; 'cdaniels@wsu.edu' [cdaniels@wsu.edu]; lenora.jones@wsu.edu
CC: 'aschreib@centurytel.net' [aschreib@centurytel.net]; 'dwalsh@wsu.edu' [dwalsh@wsu.edu]; jherrera@yakama.com; 'John Inouye (jinouye@cdpr.ca.gov)' [jinouye@cdpr.ca.gov]; gjackson@oda.state.or.us; 'sherman.takatori@isda.idaho.gov' [sherman.takatori@isda.idaho.gov]; Brown, Ronda (RR) [RRBrown2@dow.com]; dutoit@wsu.edu
Subject: Revised WA-090020 for the use of Dithane F-45 Rainshield (EPA Reg. 62719-396) to control diseases in small seeded vegetable seed crops
Attachments: 62719-396_Dithane F-45 Rainshield_20180905_WA-090020_62719_.pdf; WA-090020_Dithane F-45 Rainshield_20180905.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-090020 to Dow AgroSciences LLC for the use of Dithane F-45 Rainshield (EPA Reg. 62719-396) to control diseases in small seeded vegetable seed crops.

Please contact me if you have any questions.

Regards,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 9/5/2018 4:42:02 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; 'cdaniels@wsu.edu' [cdaniels@wsu.edu]; lenora.jones@wsu.edu
CC: 'aschreib@centurytel.net' [aschreib@centurytel.net]; 'dwalsh@wsu.edu' [dwalsh@wsu.edu]; jherrera@yakama.com; 'John Inouye (jinouye@cdpr.ca.gov)' [jinouye@cdpr.ca.gov]; gjackson@oda.state.or.us; 'sherman.takatori@isda.idaho.gov' [sherman.takatori@isda.idaho.gov]; Brown, Ronda (RR) [RRBrown2@dow.com]; dutoit@wsu.edu
Subject: Revised WA-020028 for the use of Dithane DF Rainshield (EPA Reg. 62719-402) to control diseases in small seeded vegetable seed crops
Attachments: WA-020028_Dithane DF Rainshield_20180905.pdf; 62719-402_Dithane DF Rainshield_WA-020028_20180905_62719_.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-020028 to Dow AgroSciences LLC for the use of Dithane DF Rainshield (EPA Reg. 62719-402) to control diseases in small seeded vegetable seed crops.

Please contact me if you have any questions.

Regards,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/10/2018 4:55:20 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Daniels, Catherine Hollinger [cdaniels@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; 'ben.miller@agri.idaho.gov' [ben.miller@agri.idaho.gov]; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov; Dinnen Pat USGR [pat.dinnen@syngenta.com]; Shane Johnson [ShaneJ@agmgt.com]
Subject: WA-130005 Revised Label Issued to Syngenta Crop Protection

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-130005 to Syngenta Crop Protection for use of Agri-Mek SC Insecticide/Miticide (EPA Reg. No. 100-1351) for control of spider mites on alfalfa grown for seed. The expiration date statement was extended to December 31, 2022.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 1/10/2018 4:36:16 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Daniels, Catherine Hollinger [cdaniels@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; 'ben.miller@agri.idaho.gov' [ben.miller@agri.idaho.gov]; rkachadoorian@oda.state.or.us; jinouye@cdpr.ca.gov; Shane Johnson [ShaneJ@agmgt.com]; Dinnen Pat USGR [pat.dinnen@syngenta.com]
Subject: WA-120009 Revised Label Issued to Syngenta Crop Protection
Attachments: WA-120009_Corres_20180110_EPA.pdf; WA-120009_Gramoxone SL 2.0 Alfalfa_20170818.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-120009 to Syngenta Crop Protection for use of Gramoxone SL 2.0 (EPA Reg. No. 100-1431) for desiccation of alfalfa to facilitate harvest of alfalfa grown for seed. The expiration date statement was extended to December 31, 2022.

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 8/23/2018 11:17:41 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; 'cdaniels@wsu.edu' [cdaniels@wsu.edu]; lenora.jones@wsu.edu
CC: 'aschreib@centurytel.net' [aschreib@centurytel.net]; 'dwalsh@wsu.edu' [dwalsh@wsu.edu]; jherrera@yakama.com; 'John Inouye (jinouye@cdpr.ca.gov)' [jinouye@cdpr.ca.gov]; gjackson@oda.state.or.us; 'sherman.takatori@isda.idaho.gov' [sherman.takatori@isda.idaho.gov]; ekbauer@dow.com; Kim Patten [pattenk.wsu@gmail.com]; cranmac@willapabay.org
Subject: Revised WA-030006 to Dow AgroSciences LLC for use of Stinger (EPA Reg. 62719-73) to control bird's-foot trefoil (Lotus spp.), sheep sorrel, and clover species in cranberries.
Attachments: WA-030006_Stinger_20180823.pdf; 62719-73_Stinger Herbicide_20180823_WA-030006_62719_.pdf

The Washington State Department of Agriculture has issued a revised label for Washington Special Local Need (SLN) registration number WA-030006 to Dow AgroSciences LLC for use of Stinger (EPA Reg. 62719-73) to control bird's-foot trefoil (*Lotus* spp.), sheep sorrel, and clover species in cranberries.

Please contact me if you have any questions.

Regards,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Olinger, Christine [Olinger.Christine@epa.gov]
Sent: 3/28/2018 3:23:17 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Kramer, George [Kramer.George@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; VanAlstine, Julie [VanAlstine.Julie@epa.gov]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Tawanda –
I spoke with George this morning, who has worked on the chemical and is also a co-chair of ChemSAC. He

Deliberative Process / Ex. 5

Let me know if you have any further questions.

Chris O.

Christine Olinger
Chief, Risk Assessment Branch I
Office of Pesticide Programs Health Effects Division
US Environmental Protection Agency
1200 Pennsylvania Ave NW MailCode 7509P
Washington DC 20460
Office Location: Potomac Yard South Room 10751
Phone: 703-305-5406
FAX: 703-305-5147
olinger.christine@epa.gov

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 4:04 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

We still need a RAB1 chemist to take it through the committee. It is best to use the ChemSAC process to get the response.

-Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 3:37 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Julie –

I appreciate your message. I sent an email on February 21st requesting review (please attached). I had hoped this was already raised at ChemSac and would be receiving a response by now. In light of this gap in time, is it possible for ChemSac to review this without going through the formalities.

I thank you in advance for your consideration of my request.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 3:29 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

It looks like RAB1 needs to bring it through ChemSAC. The committee hasn't discussed it yet. Typically, the requests go to the branches and the branches are responsible for bringing the items through ChemSAC.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 2:58 PM

To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus
Importance: High

Hi Julie –

Following up on whether or not you all have been able to make a determination on the request at the beginning of this email. I also provided data. I look forward to your feedback.

Many thanks –
Tawanda

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

//////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

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E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3

registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC

Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

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Message

From: VanAlstine, Julie [VanAlstine.Julie@epa.gov]
Sent: 3/28/2018 2:49:44 PM
To: Kish, Tony [Kish.Tony@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Garvie, Heather [Garvie.Heather@epa.gov]
CC: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
Subject: RE: M1840 Growth Regulator use in Corn Seed Propagation

Thanks Tony!

I'll send the minutes along once they are finalized.

-Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Kish, Tony
Sent: Wednesday, March 28, 2018 10:20 AM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: M1840 Growth Regulator use in Corn Seed Propagation

Julie- attached is the proposed paclobutrazol SLN label. You already have the other document. Looks like the proposed label restrictions would be protective even if they bagged/used seed from any subsequent non-treated F- generation. Please send copy of final ChemSAC determination to us.

Heather- I advised Monsanto (James Nyangula Personal Phone / Ex. 6 it could take maybe 4 weeks to get the final ChemSAC review (Tawanda will need a copy for eventual SLN) and to contact you in a few weeks to determine its completion status.

Tawanda- after Monsanto gets the ChemSAC review, they will ask AZ to submit the SLN (hopefully w/ChemSAC review) maybe about May at earliest. I advised them to change the label restrictions to start with "Do not…" which OECA says is stronger than things like "…is not to be used…".

Thanks, Tony

From: SEIFERT-HIGGINS, SIMONE [AG/1005] [mailto:simone.seifert-higgins@monsanto.com]
Sent: Tuesday, February 20, 2018 11:02 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: james.m.nyangulu@monsanto.com
Subject: M1840 Growth Regulator use in Corn Seed Propagation

Hi Tony,
James Nyangulu asked me to respond to your request for additional information related to our proposed use of paclobutrazol in corn for seed production only. We have reached out to Arizona's Department of Ag to apply for a

Special Local Needs registration to enable the use of Monsanto's M1840 Growth Regulator product (EPA Reg. No 524-651) on corn. Monsanto is building a fully contained greenhouse facility to house Monsanto's corn breeding pipeline and intends to use of M1840 Growth Regulator for seed propagation purposes only. I am attaching the proposed special local needs label. I am also providing a brief summary of a quantitative residue trial conducted under GLP to estimate the amount of paclobutrazol residues in corn seed harvested from treated plants.

Please feel free to contact me directly at Personal Phone / Ex. 6 or James Nyangulu at the DC office should you have questions or need additional information.

Regards,
Simone

Simone Seifert-Higgins, Ph.D.
Regulatory Affairs Manager
Monsanto Company
700 Chesterfield Parkway West
Chesterfield, MO 63017
Office: 636-737-9571
Cell: Personal Phone / Ex. 6

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Message

From: Kish, Tony [Kish.Tony@epa.gov]
Sent: 3/28/2018 2:20:20 PM
To: VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Garvie, Heather [Garvie.Heather@epa.gov]
CC: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
Subject: FW: M1840 Growth Regulator use in Corn Seed Propagation
Attachments: PacloSummary Document_February2018.pdf; PGR draft SLN label for corn_February2018.pdf

Julie- attached is the proposed paclobutrazol SLN label. You already have the other document. Looks like the proposed label restrictions would be protective even if they bagged/used seed from any subsequent non-treated F- generation. Please send copy of final ChemSAC determination to us.

Heather- I advised Monsanto (James Nyangula Personal Phone / Ex. 6 it could take maybe 4 weeks to get the final ChemSAC review (Tawanda will need a copy for eventual SLN) and to contact you in a few weeks to determine its completion status.

Tawanda- after Monsanto gets the ChemSAC review, they will ask AZ to submit the SLN (hopefully w/ChemSAC review) maybe about May at earliest. I advised them to change the label restrictions to start with "Do not…" which OECA says is stronger than things like "…is not to be used…".

Thanks, Tony

From: SEIFERT-HIGGINS, SIMONE [AG/1005] [mailto:simone.seifert-higgins@monsanto.com]
Sent: Tuesday, February 20, 2018 11:02 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: james.m.nyangulu@monsanto.com
Subject: M1840 Growth Regulator use in Corn Seed Propagation

Hi Tony,
James Nyangulu asked me to respond to your request for additional information related to our proposed use of paclobutrazol in corn for seed production only. We have reached out to Arizona's Department of Ag to apply for a Special Local Needs registration to enable the use of Monsanto's M1840 Growth Regulator product (EPA Reg. No 524-651) on corn. Monsanto is building a fully contained greenhouse facility to house Monsanto's corn breeding pipeline and intends to use of M1840 Growth Regulator for seed propagation purposes only. I am attaching the proposed special local needs label. I am also providing a brief summary of a quantitative residue trial conducted under GLP to estimate the amount of paclobutrazol residues in corn seed harvested from treated plants.

Please feel free to contact me directly at Personal Phone / Ex. 6 or James Nyangulu at the DC office should you have questions or need additional information.

Regards,
Simone

Simone Seifert-Higgins, Ph.D.
Regulatory Affairs Manager
Monsanto Company
700 Chesterfield Parkway West
Chesterfield, MO 63017
Office: 636-737-9571
Cell: Personal Phone / Ex. 6

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Message

From: VanAlstine, Julie [VanAlstine.Julie@epa.gov]
Sent: 3/28/2018 1:00:40 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thanks Tawanda.

-Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 4:52 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Ok, I will patiently await for feedback.

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 4:04 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

We still need a RAB1 chemist to take it through the committee. It is best to use the ChemSAC process to get the response.

-Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 3:37 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Julie –

I appreciate your message. I sent an email on February 21st requesting review (please attached). I had hoped this was already raised at ChemSac and would be receiving a response by now. In light of this gap in time, is it possible for ChemSac to review this without going through the formalities.

I thank you in advance for your consideration of my request.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 3:29 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

It looks like RAB1 needs to bring it through ChemSAC. The committee hasn't discussed it yet. Typically, the requests go to the branches and the branches are responsible for bringing the items through ChemSAC.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 2:58 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus
Importance: High

Hi Julie –

Following up on whether or not you all have been able to make a determination on the request at the beginning of this email. I also provided data. I look forward to your feedback.

Many thanks –
Tawanda

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

//////////////////

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Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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United States

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E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

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Tel: +1 919 549 2631
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E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri*. Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

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Message

From: Inouye, John@CDPR [John.Inouye@cdpr.ca.gov]
Sent: 2/21/2018 11:25:03 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

You're welcome. Every now and then we run into a situation in which the residue data that established the tolerance will not support all use patterns. We're just being extra cautious.

You're help on this issue is appreciated.

Thanks,

John

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 3:19 PM
To: Inouye, John@CDPR
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

John –

Thank you for your quick response. We are looking into the data.

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, February 21, 2018 6:14 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Tawanda-

I think the main concern we have is with the residue data that was used to establish the tolerance. The company and California just want confirmation from your Agency the existing residue data and tolerance will support a possible 24(c) on citrus and or mandarins. I would think the existing tolerance would support the 24(c) use pattern.

Sincerely,

John

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 1:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: Inouye, John@CDPR; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez

Registration Manager

Bayer: Science For A Better Life

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E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
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1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive

<esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson

Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri*. Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel (office): +1 919.549.5355
Tel (cell): +1 919.475.6959
Fax: +1 919.549.2905

christine.villegas@bayer.com

Web: http://www.bayer.com

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Message

From: Rose Kachadoorian [rkachadoorian@oda.state.or.us]
Sent: 12/20/2017 8:11:19 PM
To: Patricia (Pat) Dinnen [pat.dinnen@syngenta.com]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Sunseri, Matthew (MDA) (Matthew.Sunseri@state.mn.us) [Matthew.Sunseri@state.mn.us]; otto.oemig@wisconsin.gov
Subject: Re: Syngenta 24(c) Cancellation Request - Bravo 825 Agricultural Fungicide, EPA Reg. No. 50534-201
Attachments: BravoUltrexCancelLtr_12-18-17.pdf

Pat,

Did you also send a letter directly to ODA?

The process is that the registrant sends the voluntary cancellation letter to the state; then the state cancels the state issued registration, and notifies EPA of the voluntary cancellation.

Rose Kachadoorian
President Elect AAPCO
Pesticide Regulatory Leader
Pesticides Program
Oregon Department of Agriculture
635 Capitol St. NE, Salem, OR 97301
503/986-4651 Phone, 503/986-4735 Fax
Email: rkachadoorian@oda.state.or.us

On Dec 20, 2017, at 12:05 PM, Dinnen Pat USGR <pat.dinnen@syngenta.com> wrote:

Dear Ms. Maignan:

Please see attached letter requesting cancellation of three Bravo 825 Agricultural Fungicide SLN's due to transfer of registration to another company.

If you have any questions, please do not hesitate to call me at 336-632-2494 or email me at pat.dinnen@syngenta.com. Thank you.

Sincerely,
Pat

Patricia Dinnen, Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 12/20/2017 8:03:07 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: verhougstraeteb@michigan.gov; Sunseri, Matthew (MDA) (Matthew.Sunseri@state.mn.us) [Matthew.Sunseri@state.mn.us]; Jdsauter@nd.gov; tim.creger@nebraska.gov; Areta Wowk [areta.wowk@dep.nj.gov]; Lumsden, Shannon (AGR) (SLumsden@agr.wa.gov) [SLumsden@agr.wa.gov]; Rose Kachadoorian (rkachadoorian@oda.state.or.us) [rkachadoorian@oda.state.or.us]; otto.oemig@wisconsin.gov
Subject: Syngenta 24(c) Cancellation Request - Bravo 720, EPA Reg. No. 50534-188
Attachments: BravoWeatherStikCancelLtr_12-18-17.pdf

Dear Ms. Maignan:

Please see attached letter requesting cancellation of 11 Bravo 720 SLN's due to transfer of registration to another company.

If you have any questions, please do not hesitate to call me at 336-632-2494 or email me at pat.dinnen@syngenta.com. Thank you.

Sincerely,
Pat

Patricia Dinnen, Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 12/20/2017 7:59:44 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Tomlinson, Mary E [Mary.E.Tomlinson@maine.gov]; verhougstraeteb@michigan.gov; Sunseri, Matthew (MDA) (Matthew.Sunseri@state.mn.us) [Matthew.Sunseri@state.mn.us]; Jdsauter@nd.gov; tim.creger@nebraska.gov; otto.oemig@wisconsin.gov
Subject: Syngenta 24(c) Cancellation Request - Bravo ZN, EPA Reg. No. 50534-201
Attachments: BravoZNCancelLtr_12-18-17.pdf

Dear Ms. Maignan:

Please see attached letter requesting cancellation of six Bravo ZN SLN's due to transfer of registration to another company.

If you have any questions, please do not hesitate to call me at 336-632-2494 or email me at pat.dinnen@syngenta.com. Thank you.

Sincerely,
Pat

Patricia Dinnen, Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Garvie, Heather [Garvie.Heather@epa.gov]
Sent: 5/1/2018 11:16:49 AM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Subject: FW: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

fyi

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Tuesday, May 01, 2018 7:12 AM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Heather,
Yes, we are going ahead with plans to work with Arizona for a 24(c) registration. Thanks for the additional information. I will be reaching out to Nikhil as soon as we are ready.

Thanks

James

From: Garvie, Heather [mailto:Garvie.Heather@epa.gov]
Sent: Tuesday, May 01, 2018 7:07 AM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Thanks James. I also wanted to add that if there was still an interest in obtaining a SLN that you should work with the respective state in which they seek to obtain a 24(c) registration. Any questions regarding processing, please contact Nikhil Mallampalli, the Acting Emergency Response Team Leader.

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Tuesday, May 01, 2018 6:57 AM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Good morning Heather,
Thank you for passing the ChemSAC minutes along. Our team will review and get back to you if we have any clarifying questions.

Thanks again

James

From: Garvie, Heather [mailto:Garvie.Heather@epa.gov]
Sent: Tuesday, May 01, 2018 6:51 AM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

James:

Attached are the ChemSAC meeting minutes.

Heather

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Tuesday, April 17, 2018 3:20 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Thanks for your prompt response Heather.....Looking forward to hearing from you again in a couple of weeks.

Thanks

James

From: Garvie, Heather [mailto:Garvie.Heather@epa.gov]
Sent: Monday, April 16, 2018 3:22 PM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi James:

ChemSAC should have something to us by the first full week of May. As soon as I receive it I will be in touch.

Thanks,
Heather

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, April 16, 2018 12:10 PM
To: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Importance: High

Cynthia and/or Heather,

This is a follow up note from Tony's email below.

Our application for "non-food use" determination was discussed at March 28th ChemSAC meeting and Tony Kish called me afterwards to let me know that we received a favorable result. I would like to find out when we are going to receive formal notification. We are planning to make an application to Arizona for 24(c) SLN at the end of this month.....the ChemSAC determination is an important piece to that application.

Thanks

James

From: Kish, Tony [mailto:Kish.Tony@epa.gov]
Sent: Monday, March 12, 2018 2:52 PM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

James- ChemSAC is scheduled for 3/28 and we will forward that decision after we get it from HED which could take some time. I'm retiring 3/31 so I included Cynthia/Heather who can forward the decision.

Thanks, Tony

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, March 12, 2018 1:27 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Tony,
You helped us submit an application to ChemSAC for this PGR and wanted to check if a decision has been made yet?

Thanks

James

James M. Nyangulu, PhD
Monsanto Company
1300 I Street, NW
Suite 450E
Washington, DC 20005

(202) 383-2866 (Direct – Office)
Personal Phone / Ex. 6 (Mobile)

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Message

From: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
Sent: 4/30/2018 4:44:11 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Garvie, Heather [Garvie.Heather@epa.gov]
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Thank you, Tawanda.

From: Maignan, Tawanda
Sent: Monday, April 30, 2018 12:30 PM
To: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Good morning Cynthia –

I would advise them if there was still an interest in obtaining a SLN to work with the respective state in which they seek to obtain a 24(c) registration. Any questions regarding processing, to contact Nikhil Mallampalli, the Acting Emergency Response Team Leader.

Thanks –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Giles-Parker, Cynthia
Sent: Monday, April 30, 2018 9:58 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: FW: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Tawanda

I wanted to share this review from the ChemSac on the non-food use determination for paclobutrazol. I believe you were on some earlier emails regarding Monsanto's desire to request a SLN. The use on corn is in a greenhouse. The PM team is ready to share the results the non-food use determination, but I don't think we will give any guidance on whether this is allowed under an SLN. Would there be other information you would like for us to communicate to Monsanto regarding the SLN?

Cynthia

From: VanAlstine, Julie
Sent: Monday, April 30, 2018 8:53 AM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Heather,

The final paclobutrazol minutes are attached.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Garvie, Heather
Sent: Monday, April 16, 2018 3:22 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Thanks!

From: VanAlstine, Julie
Sent: Monday, April 16, 2018 3:20 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Heather,

We are reviewing the draft minutes at our next ChemSAC meeting (4/25). Unless there are any issues, they should be finalized by the following Friday. I will send you a copy once it goes final.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Garvie, Heather
Sent: Monday, April 16, 2018 3:18 PM

To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Importance: High

Hi Julie: per the request below, can you give me an idea of when Cynthia and I will get something in writing from ChemSAC? Personal Security Detail / Ex. 6 and I'm acting for him until a replacement is found. Thanks!

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, April 16, 2018 12:10 PM
To: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Importance: High

Cynthia and/or Heather,

This is a follow up note from Tony's email below.

Our application for "non-food use" determination was discussed at March 28th ChemSAC meeting and Tony Kish called me afterwards to let me know that we received a favorable result. I would like to find out when we are going to receive formal notification. We are planning to make an application to Arizona for 24(c) SLN at the end of this month.....the ChemSAC determination is an important piece to that application.

Thanks

James

From: Kish, Tony [mailto:Kish.Tony@epa.gov]
Sent: Monday, March 12, 2018 2:52 PM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

James- ChemSAC is scheduled for 3/28 and we will forward that decision after we get it from HED which could take some time. I'm retiring 3/31 so I included Cynthia/Heather who can forward the decision.

Thanks, Tony

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, March 12, 2018 1:27 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Tony,
You helped us submit an application to ChemSAC for this PGR and wanted to check if a decision has been made yet?

Thanks

James

James M. Nyangulu, PhD

Monsanto Company
1300 I Street, NW
Suite 450E
Washington, DC 20005

(202) 383-2866 (Direct – Office)
Personal Phone / Ex. 6 (Mobile)

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Message

From: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
Sent: 4/30/2018 1:58:00 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Garvie, Heather [Garvie.Heather@epa.gov]
Subject: FW: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Attachments: 2018-03-28-Paclobutrazol.docx

Tawanda

I wanted to share this review from the ChemSac on the non-food use determination for paclobutrazol. I believe you were on some earlier emails regarding Monsanto's desire to request a SLN. The use on corn is in a greenhouse. The PM team is ready to share the results the non-food use determination, but I don't think we will give any guidance on whether this is allowed under an SLN. Would there be other information you would like for us to communicate to Monsanto regarding the SLN?

Cynthia

From: VanAlstine, Julie
Sent: Monday, April 30, 2018 8:53 AM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Heather,

The final paclobutrazol minutes are attached.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Garvie, Heather
Sent: Monday, April 16, 2018 3:22 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Thanks!

From: VanAlstine, Julie
Sent: Monday, April 16, 2018 3:20 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Heather,

We are reviewing the draft minutes at our next ChemSAC meeting (4/25). Unless there are any issues, they should be finalized by the following Friday. I will send you a copy once it goes final.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Garvie, Heather
Sent: Monday, April 16, 2018 3:18 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Importance: High

Hi Julie: per the request below, can you give me an idea of when Cynthia and I will get something in writing from ChemSAC? Tony has retired and I'm acting for him until a replacement is found. Thanks!

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, April 16, 2018 12:10 PM
To: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn
Importance: High

Cynthia and/or Heather,

This is a follow up note from Tony's email below.

Our application for "non-food use" determination was discussed at March 28th ChemSAC meeting and Tony Kish called me afterwards to let me know that we received a favorable result. I would like to find out when we are going to receive formal notification. We are planning to make an application to Arizona for 24(c) SLN at the end of this month.....the ChemSAC determination is an important piece to that application.

Thanks

James

From: Kish, Tony [mailto:Kish.Tony@epa.gov]
Sent: Monday, March 12, 2018 2:52 PM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

James- ChemSAC is scheduled for 3/28 and we will forward that decision after we get it from HED which could take some time. I'm retiring 3/31 so I included Cynthia/Heather who can forward the decision.

Thanks, Tony

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Monday, March 12, 2018 1:27 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: ChemSAC Review of Paclobutrazol as "Non food" Use in Corn

Hi Tony,
You helped us submit an application to ChemSAC for this PGR and wanted to check if a decision has been made yet?

Thanks

James

James M. Nyangulu, PhD
Monsanto Company
1300 I Street, NW
Suite 450E
Washington, DC 20005

(202) 383-2866 (Direct – Office)
(202) 304-6594 (Mobile)

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Message

From: Kish, Tony [Kish.Tony@epa.gov]
Sent: 2/16/2018 5:00:23 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
Subject: FW: Paclobutrazol Review at ChemSAC

Tawanda- I will ask for the summary and fwd to ChemSAC but reluctant to get/send proposed SLN label to ChemSAC as it could be misinterpreted as a defacto SLN application in my mind - what do you think?

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Friday, February 16, 2018 10:33 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: RE: Paclobutrazol Review at ChemSAC

Hi Tony,
After telling me they couldn't have a summary residue study report ready until later this month, they have sent me a three page summary to go with the ChemSAC application. Would you still like to get it or is it too late? I also have a draft label that would accompany the product's use when used under 24 (c).

Thanks

James

From: Kish, Tony [mailto:Kish.Tony@epa.gov]
Sent: Thursday, February 15, 2018 5:41 PM
To: NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: Paclobutrazol Review at ChemSAC

I have sent your request today to ChemSAC with a request that you need it as soon as possible and will advise when we get a response.

Thanks, Tony Kish

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Thursday, February 15, 2018 3:47 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: Paclobutrazol Review at ChemSAC
Importance: High

Hi Tony,
I have talked to my colleagues and we have decided to have the application proceed as is. But please include the email we sent you together with the attachment. It was also pointed out to me this morning that the EPA has recently determined that seed treatments that result in RACs <5ppb is considered "non food". We calculated that grain with 0.2ppm paclobutrazol is diluted to 0.8ppb after one generation. Given that seed/grain will go through four generations of dilution, it further points to the use pattern as non food .

Please keep me posted on any developments as well as the schedule for our application.

Thanks

James

(202) 383-2866

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Message

From: Wilbur, Donald [Wilbur.Donald@epa.gov]
Sent: 2/15/2018 11:34:36 PM
To: Kish, Tony [Kish.Tony@epa.gov]
CC: VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Kramer, George [Kramer.George@epa.gov]; Savoia, Pete [Savoia.Pete@epa.gov]; Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]; Garvie, Heather [Garvie.Heather@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Piper, Sheila [Piper.Sheila@epa.gov]
Subject: Re: Paclobutrazol- Request for ChemSAC Determination as "Non-food" Use in Corn

Tony- This is a RAB6 chemical so a chemist from that branch will take to to chemsac. We will let you know if we have any questions and make sure you are invited to the meeting. Thanks!

Sent from my iPhone

On Feb 15, 2018, at 5:35 PM, Kish, Tony <Kish.Tony@epa.gov> wrote:

> Greetings HED- see Monsanto's two separate emails below. Can someone please arrange a ChemSAC meeting to determine if the proposed corn seed treatment use is non-food. No residue data were submitted and the attached document stands on its own merit.
>
> Also, if somebody could cc invite me/Cynthia/Heather to the meeting that would be great.
>
> Monsanto tells me they would appreciate a response as soon as possible. I did not promise anything. After they get the ChemSAC determination, they may submit as a 24C--SLN application.
>
> Thanks, Tony Kish
>
> ---
>
> **From:** Davis, Donna
> **Sent:** Tuesday, February 13, 2018 6:06 AM
> **To:** Kish, Tony <Kish.Tony@epa.gov>
> **Subject:** RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn
>
> I think the current ChemSAC co chairs are Julie VanAlstine and George Kramer.
>
> ---
>
> **From:** Kish, Tony
> **Sent:** Monday, February 12, 2018 5:33 PM
> **To:** Davis, Donna <Davis.Donna@epa.gov>
> **Subject:** RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn
>
> Hi Donna- Who in HED now handles ChemSAC requests?
>
> ---
>
> **From:** Davis, Donna
> **Sent:** Monday, February 12, 2018 1:00 PM
> **To:** Kish, Tony <Kish.Tony@epa.gov>
> **Subject:** RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn
>
> It also has a PGR use. I recall that they wanted to use it with tree nuts to stunt the growth of the trees and minimize the need to prune around electrical lines.
>
> ---
>
> **From:** Kish, Tony
> **Sent:** Thursday, February 08, 2018 6:33 PM

To: Davis, Donna <Davis.Donna@epa.gov>
Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

OK will do next week. He calls paclobutrazol a PGR but it's a fungicide.

From: Davis, Donna
Sent: Thursday, February 08, 2018 6:07 PM
To: Kish, Tony <Kish.Tony@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

James called about this issue. I suggested that he send it in through the PM, as it sounded like a ChemSAC issue. Let me know if you have any issues getting it reviewed when you send it up to RAB6 and maybe I can help to move it along.
Thanks,
Donna

Hi Tony,
I have talked to my colleagues and we have decided to have the application proceed as is. But please include the email we sent you together with the attachment. It was also pointed out to me this morning that the EPA has recently determined that seed treatments that result in RACs <5ppb is considered "non food". We calculated that grain with 0.2ppm paclobutrazol is diluted to 0.8ppb after one generation. Given that seed/grain will go through four generations of dilution, it further points to the use pattern as non food .

Please keep me posted on any developments as well as the schedule for our application.
Thanks
James
(202) 383-2866

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Thursday, February 08, 2018 9:03 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
Subject: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

Hi Tony,
On behalf of Monsanto, I am submitting a request for ChemSAC review to consider the use of a FIFRA-regulated plant growth regulator (active ingredient paclobutrazol) in corn seed production, in protected culture (i.e. greenhouse) as non-food use. EPA regulations allow pesticide use on crops grown to produce seed specifically for crop reproduction purposes to be considered "nonfood and nonfeed use" if no parts of the crop are diverted for food or feed use and there is no likelihood of residues in crops grown from harvested seed [OPPTS 860.1000(e)(B)(1)]. Full details of our request have been provided in the attachment.

Monsanto is intending to pursue a 24(c) registration to enable paclobutrazol use for seed production purposes. The proposed 24(c) registration will restrict the PGR use to corn seed production at Monsanto's greenhouse facility built and managed to meet NIH guidelines and USDA confinement requirements which are designed to prevent any materials from entering food or feed channels. The 24(c) label will clearly prohibit that any parts of the corn crop be diverted for human food or livestock feed. Corn seed

produced at this greenhouse facility will be used for plantings only and will bear tags or container labels which clearly forbids use for human consumptions and animal feed.

Monsanto strongly believes that this PGR use in corn for seed production meets requirements for "nonfood use" and can be appropriately stewarded. Monsanto respectfully requests the review of this matter by ChemSAC and welcomes the opportunity to discuss this proposed nonfood use in more detail. Should you have questions or need additional information please don't hesitate to contact me or Dr Simone Seifert-Higgins at (636) 737-9571 or simone.seifert-higgins@monsanto.com

James M. Nyangulu, PhD
Monsanto Company
1300 I Street, NW
Suite 450E
Washington DC 20005
(202) 383-2866 (Office)
Personal Phone / Ex. 6 (Cell)

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<PGR use for breeding_v5.docx>

Message

From: Kish, Tony [Kish.Tony@epa.gov]
Sent: 2/15/2018 10:35:43 PM
To: Wilbur, Donald [Wilbur.Donald@epa.gov]; VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Kramer, George [Kramer.George@epa.gov]; Savoia, Pete [Savoia.Pete@epa.gov]
CC: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]; Garvie, Heather [Garvie.Heather@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Paclobutrazol- Request for ChemSAC Determination as "Non-food" Use in Corn
Attachments: PGR use for breeding_v5.docx

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Thanks, Tony Kish

From: Davis, Donna
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Sent: Monday, February 12, 2018 5:33 PM
To: Davis, Donna <Davis.Donna@epa.gov>
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Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

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From: Davis, Donna
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To: Kish, Tony <Kish.Tony@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

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James
(202) 383-2866

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Thursday, February 08, 2018 9:03 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
Subject: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

Hi Tony,
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James M. Nyangulu, PhD
Monsanto Company
1300 I Street, NW

Suite 450E
Washington DC 20005
(202) 383-2866 (Office)
Personal Phone / Ex. 6 (Cell)

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Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 12/5/2016 10:04:33 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Dinnen Pat USGR [pat.dinnen@syngenta.com]; Miller, Timothy W [twmiller@wsu.edu]; info@red-raspberry.org; Jones, Lenora J [lenora.jones@wsu.edu]; 'rkachadoorian@oda.state.or.us' [rkachadoorian@oda.state.or.us]; 'ben.miller@agri.idaho.gov' [ben.miller@agri.idaho.gov]; 'jinouye@cdpr.ca.gov' [jinouye@cdpr.ca.gov]
Subject: WA-120002 Revised Special Local Needs Registration for use of Dual Magnum to Control Weeds in Berries
Attachments: WA_120002_Dual Magnum_20161205.pdf; WA-120002_Corres_20161205_EPA.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-120002 to Syngenta Crop Protection in for use of Dual Magnum to control weeds in highbush blueberry, blackberry, and red and black raspberry. This registration was issued under authority of Section 24(c) FIFRA.

The expiration date statement was extended to December 31, 2021.

If you have any questions, please contact me at 360-902-2032 or email to slumsden@agr.wa.gov

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 12/5/2016 9:56:35 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Dinnen Pat USGR [pat.dinnen@syngenta.com]; Miller, Timothy W [twmiller@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; 'rkachadoorian@oda.state.or.us' [rkachadoorian@oda.state.or.us]; 'ben.miller@agri.idaho.gov' [ben.miller@agri.idaho.gov]; 'jinouye@cdpr.ca.gov' [jinouye@cdpr.ca.gov]
Subject: WA-120001 Revised Special Local Needs Label for Dual Magnum
Attachments: WA-12001_Corres_20161205_EPA.pdf; WA-12001_Dual Magnum_20161205.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-120001 to Syngenta Crop Protection in for use of Dual Magnum to control Yellow Nutsedge, Powell Amaranth and Hairy Nightshade in garden beet and Swiss chard grown for seed. This registration was issued under authority of Section 24(c) FIFRA.

The expiration date statement was extended to December 31, 2021.

If you have any questions, please contact me at 360-902-2032 or email to slumsden@agr.wa.gov

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
----James Dean

Message

From: Lumsden, Shannon (AGR) [SLumsden@agr.wa.gov]
Sent: 12/5/2016 9:53:49 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Dinnen Pat USGR [pat.dinnen@syngenta.com]; Miller, Timothy W [twmiller@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; 'rkachadoorian@oda.state.or.us' [rkachadoorian@oda.state.or.us]; 'ben.miller@agri.idaho.gov' [ben.miller@agri.idaho.gov]; 'jinouye@cdpr.ca.gov' [jinouye@cdpr.ca.gov]
Subject: WA-120001 Revised Special Local Needs Label for Dual Magnum

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-120001 to Syngenta Crop Protection in for use of Dual Magnum to control Yellow Nutsedge, Powell Amaranth and Hairy Nightshade in garden beet and Swiss chard grown for seed. This registration was issued under authority of Section 24(c) FIFRA.

The expiration date statement was extended to December 31, 2021.

If you have any questions, please contact me at 360-902-2032 or email to slumsden@agr.wa.gov

Shannon Lumsden
Registration Specialist
Washington State Dept of Agriculture
360-902-2032
slumsden@agr.wa.gov

"Dream as if you'll live forever – Live as if you'll die today"
~~~~James Dean

Message

From: John Ewell [John.Ewell@tn.gov]
Sent: 3/2/2017 9:04:12 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Syngenta Request to Amend TN-160002 - Dual Magnum Herbicide
Attachments: TN_DualMagMultiCropSLNCvrLtr_03-02-17.pdf; TN_DualMagnumMultiCropSLNFedApForm_03-02-2017.pdf; TN_DualMagnumMultiCropDraftSLNLbl_03-02-17.pdf; TNDualMagSweetPotatoSupportLtr_LSteckel_10-31-16.pdf; S-MetolachlorTolerancesSweetPotatoFedReg_08-31-05.pdf; DualMagnum_100-816_Label.pdf; DualMagnum_100-816_SDS.pdf

Hello Tawanda,

Attached is the information you've requested from Syngenta regarding amending the label for Dual Magnum herbicide for use on controlling weeds in sweet potato production in Tennessee.

Please advise me if there's anything I need to do to help.

Thanks

TN Department of Agriculture | Consumer & Industry Services

JOHN EWELL | Supervisor, Product Registration
Department of Agriculture
Pesticide Section
Ellington Agricultural Center
436 Hogan Road, Nashville, TN 37220
p. 615-837-5340 f. 615-837-5012
john.ewell@tn.gov
www.tn.gov/agriculture

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From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Thursday, March 02, 2017 2:55 PM
To: john.ewell@state.tn.us
Subject: Syngenta Request to Amend TN-160002 - Dual Magnum Herbicide

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Syngenta Crop Protection Is respectfully requests to amend TN-160002 for Dual Magnum Herbicide (EPA Reg. No. 100-816) to add sweet potatoes to the directions for use. To support this request the following documents are attached.

- Syngenta Cover Letter
- EPA SLN Application Form 8570-25
- Draft SLN Label
- Federal Register Notice Establishing Tolerances dated August 31, 2005
- Support Letter from Dr. Larry Steckel of the University of Tennessee

- Dual Magnum Federal Label
- Dual Magnum SDS

If you have any questions, please do not hesitate to call me at 336-632-2494 or email me at pat.dinnen@syngenta.com.

Thanks,
Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Sauter, Jerry D. [jdsauter@nd.gov]
Sent: 9/22/2016 4:46:21 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: SLN Expiration
Attachments: 000984_L24C_04.02_2.pdf

Hi TaWanda,
You will be receiving a 24c extension soon, here is the correct label-I missed the error on the hardcopy I sent you.
Thanks, Jerry

From: Danyel Ward [mailto:danyel.ward@bayer.com]
Sent: Thursday, September 22, 2016 11:42 AM
To: Sauter, Jerry D. <jdsauter@nd.gov>
Cc: Danyel Ward <danyel.ward@bayer.com>
Subject: RE: SLN Expiration

Hi Jerry,

I just noticed in the file that I sent you, that I entered "20121" instead of "2021" as the year for the new expiration date. Please find attached a revised label correcting this typo. Sorry about that.

Best Regards,

Danyel L. Ward

From: Sauter, Jerry D. [mailto:jdsauter@nd.gov]
Sent: Thursday, September 22, 2016 12:11 PM
To: Danyel Ward
Subject: RE: SLN Expiration

HI Danyel,
I approved the new label and I sent it to EPA for acknowledgement, I will forward you a copy of their letter when I get it.
I will upload your new label into Kelly.
Thanks, Jerry

From: Danyel Ward [mailto:danyel.ward@bayer.com]
Sent: Wednesday, September 07, 2016 2:46 PM
To: Sauter, Jerry D. <jdsauter@nd.gov>
Cc: Danyel Ward <danyel.ward@bayer.com>
Subject: RE: SLN Expiration

Hi Jerry,

Ignite was replaced with the alternate brand name product Liberty 280 SL Herbicide. In 2012 Bayer also changed the SLN ND-110005 to Liberty 280 SL and in 2014 revised this label. Bayer would like to renew the Liberty 280 SL 24(c) and I'm attaching the revised label for your review. The label amendment to have this use incorporated into the Section 3 is still pending with the US EPA. Please let me know if you need any additional information from me. Thanks!

Best Regards,

Danyel L. Ward

From: Christine Villegas
Sent: Friday, September 02, 2016 12:23 PM
To: Sauter, Jerry D.; Danyel Ward
Subject: RE: SLN Expiration

Hi Jerry,

Thanks for reaching out about the upcoming expiration date for the 24c for Ignite. Danyel Ward is the state registration contact for Ignite and I've included her on the email so she can follow up with you.

Have a great weekend,
Christie

Best regards,

Christie Villegas
State Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations, C2510-05
Research Triangle Park, NC, 27709, USA

Tel: 919.549.5355
Fax: 919.549.2905
Mobile: 919.475.6959
E-mail: christine.villegas@bayer.com
Web: http://www.bayer.com

From: Sauter, Jerry D. [mailto:jdsauter@nd.gov]
Sent: Friday, September 02, 2016 12:08 PM
To: Christine Villegas
Subject: SLN Expiration

Good morning Christine,
If you're not the appropriate contact for this matter, please forward on.
I just wanted to double check something, Bayer's 24(c) label for Ignite expires December 31, 2016 and I assume this use was incorporated into the new Section 3 label. If it was not and you want to renew the 24(c) please let me know.
Thanks, Jerry

Jerry Sauter
Pesticide Program Manager
North Dakota Department of Agriculture
600 E. Boulevard Ave Dept. 602 | Bismarck, ND 58505
P: 701-328-2980 | Fax: 701-328-4567
www.nd.gov/ndda

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 2/17/2017 10:03:42 PM
To: ewhite@purdue.edu
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Syngenta Cancellation Request - IN-110001 - Quadris Flowable Fungicide
Attachments: ~IN_QuadrisGrnHseTobacco_SLNCancelLtr_02-15-17.pdf

Hello Ed,

Please see the attached cancellation letter for VA-110001. The reason we are requesting cancellation is that this use has been added to the Section 3 label.

If you have any questions, please let me know.

Thanks,
Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 2/17/2017 9:58:03 PM
To: Micah.Raub@vdacs.virginia.gov
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Syngenta Cancellation Request - VA-110001 - Quadris Flowable Fungicide
Attachments: VA_QuadrisGrnHseTobacco_SLNCancelLtr_02-15-17.pdf

Hi Micah,

Please see the attached cancellation letter for VA-110001. The reason we are requesting cancellation is that this use has been added to the Section 3 label.

If you have any questions, please let me know.

Thanks,
Pat

Patricia (Pat) Dinnen
Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Brian Thomassen [bthomassen@tkinet.com]
Sent: 11/23/2016 9:10:11 PM
To: Davis, Kelle (AGR) [KMDavis@agr.wa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]; cdaniels@wsu.edu; Jones, Lenora J (lenora.jones@wsu.edu) [lenora.jones@wsu.edu]
CC: aschreib@centurytel.net; Ben Miller (ben.miller@agri.idaho.gov) [ben.miller@agri.idaho.gov]; David Priebe [dpriebe@oda.state.or.us]; dwalsh@wsu.edu; jherrera@yakama.com; John Inouye (jinouye@cdpr.ca.gov) [jinouye@cdpr.ca.gov]
Subject: RE: Cancellation of WA-110005 for use of Lorox DF on carrots
Attachments: Lorox DF 061842-00023-20160829 - EPA Stamp Label.pdf

Kelle – thank you for posting this announcement to concerned parties.

All – as reference please see the attached Lorox DF Section 3 EPA stamped label (8/29/2016) which contains the previous WA-110005 SLN language incorporated (and highlighted) on page 8.

Please let me know of any questions.

Regards,

Brian Thomassen
Regulatory Affairs Manager
Tessenderlo Kerley, Inc
P: 602-889-8397

From: Davis, Kelle (AGR) [mailto:KMDavis@agr.wa.gov]
Sent: Wednesday, November 23, 2016 1:50 PM
To: maignan.tawanda@epa.gov; cdaniels@wsu.edu; Jones, Lenora J (lenora.jones@wsu.edu); Brian Thomassen
Cc: aschreib@centurytel.net; Ben Miller (ben.miller@agri.idaho.gov); David Priebe; dwalsh@wsu.edu; jherrera@yakama.com; John Inouye (jinouye@cdpr.ca.gov)
Subject: Cancellation of WA-110005 for use of Lorox DF on carrots

Tessenderlo Kerley has voluntarily cancelled Washington Special Local Need (SLN) registration number WA-110005 for use of Lorox DF (EPA Reg. No. 61842-23) on carrots to control weeds.

Sincerely,

Kelle M. Davis

Registration Services Supervisor
Washington State Department of Agriculture
Pesticide Management Division
P: (360) 902-1851 M: (360) 584-8952
kmdavis@agr.wa.gov

WSDA

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Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 11/21/2016 4:55:17 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; cdaniels@wsu.edu; Jones, Lenora J (lenora.jones@wsu.edu) [lenora.jones@wsu.edu]
CC: aschreib@centurytel.net; Ben Miller (ben.miller@agri.idaho.gov) [ben.miller@agri.idaho.gov]; David Priebe [dpriebe@oda.state.or.us]; dwalsh@wsu.edu; jherrera@yakama.com; John Inouye (jinouye@cdpr.ca.gov) [jinouye@cdpr.ca.gov]; Kristen Shears (kshears@dow.com) [kshears@dow.com]
Subject: Cancellation of WA-060002 for use of Kerb 50-W (EPA Reg. No. 62719-397) for weed control in Christmas tree plantations
Attachments: WA-060002_20161121_Cancellation.pdf

Dow AgroSciences has cancelled Washington Special Local Need (SLN) registration number WA-060002 for use of Kerb 50-W (EPA Reg. No. 62719-397) for weed control in Christmas tree plantations.

Sincerely,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Johnson, Hope [Johnson.Hope@epa.gov]
Sent: 8/8/2016 5:07:38 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Tebuconazole: Possible 24(c)

Ok. There's no "amendment" here if only an import. It would be a new use. I'll let you know if they contact me.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Maignan, Tawanda
Sent: Monday, August 08, 2016 12:35 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Subject: FW: Tebuconazole: Possible 24(c)

It looks like they are coming your way…..

From: Maignan, Tawanda
Sent: Monday, August 08, 2016 12:29 PM
To: 'Jessica Fernandez' <jessica.fernandez@bayer.com>
Cc: charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas <christine.villegas@bayer.com>; Johnson, Marion <Johnson.Marion@epa.gov>; Madden, Barbara <Madden.Barbara@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Tebuconazole: Possible 24(c)

Jessica -- Thanks for the response and it is my understanding that Hope Johnson is the PM for this active.

Regards,
Tawanda

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Monday, August 08, 2016 12:26 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas <christine.villegas@bayer.com>; Johnson, Marion <Johnson.Marion@epa.gov>; Madden, Barbara <Madden.Barbara@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Tebuconazole: Possible 24(c)

Thank you Tawanda. I will check with the PMs (Tony, and Shaja) to obtain additional information on the possibility of an amendment.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709
Tel: +1 919 5492631
Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Monday, August 08, 2016 11:17 AM
To: Jessica Fernandez
Cc: charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com); Christine Villegas; BCSReg_Archive; Johnson, Marion
Subject: RE: Tebuconazole: Possible 24(c)

Good morning Jessica,

Generally speaking, I would not be in support of allowing this use pattern under a section 24(c) special local need registration. Although, an import tolerance is established for orange, there are no U.S. registrations. Moreover, I am not sure if the current tolerance would support the proposed use pattern for direct use within the U.S. This would be an expansion of the Section 3 label that may raise human or environmental risk concerns and the only way to confirm no additional exposure or risk would occur would require a risk assessment. In these type of cases, it is recommended the registrant seek a Section 3 registration amendment under PRIA. Let me know if you have any additional questions.

Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Monday, August 08, 2016 7:30 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Madden, Barbara <Madden.Barbara@epa.gov>; charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas

<christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: Tebuconazole: Possible 24(c)

Hi Tawanda – I just wanted to provide additional details to my voice message from last Thursday:

Bayer is evaluating the possibility of pursuing a 24(c) registration in Florida for one of our tebuconazole formulations. The proposed use would be on oranges, for control of Post Bloom Fruit Drop. Based on grower feedback and our communication with Charlie Clark, of FDACS, we believe that this use fits within the scope of Sec. 24(c), in that the lack of tools currently available to growers for control of this disease, support it as a special local need in Florida. We are seeking clarity however, in regards to the tolerance requirements, as stipulated under Sec. 24(c). In the case of tebuconazole, there is an existing import tolerance established on oranges. The language stated under 24(c) does not seem to distinguish between domestic and import tolerances and therefore we are seeking clarity as to whether there are any policies that would preclude the use of an import tolerance in support of a registration under 24(c).

Below are the MRID numbers for the residue data currently on file with the Agency in support of the orange tolerance for tebuconazole:

- 48961901, 48961902, 48961903 (two processing studies and one post-harvest study), and 49073101 (citrus crop field study)

There is a use registered in Brazil currently for their Nativo (10% trifloxystrobin + 20% tebuconazole) on citrus. The formulations which we are considering for the 24(c), are 264-849 (trifloxystrobin 22.63% + tebuconazole 22.63%), or 264-1091(fluopyram 17.6% + tebuconazole 17.6%). Both, Trifloxystrobin and Fluopyram are currently registered in the US for use on citrus. We would propose a use pattern that does not exceed what is already registered for trifloxystrobin or fluopyram , and a rate of tebuconazole equivalent to what is registered currently in Brazil.

Thanks in advance for any guidance you can provide and please let me know if you need additional information.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709
Tel: +1 919 5492631
Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

From: Jessica Fernandez
Sent: Friday, July 22, 2016 8:58 AM
To: charlie.clark@freshfromflorida.com
Cc: Christine Villegas
Subject: Tebuconazole: Possible 24(c)

Hi Charlie,

Christine and I were wondering If it would be possible to set up a call with you, for a short discussion on a potential 24(c) request for control of Citrus Anthracnose (Post Bloom Fruit Drop). We understand from grower feedback, that there is a

true need for additional products that will provide control of this disease in FL. We have consulted with our colleagues in Brazil, where the disease is also prevalent, and we have learned that tebuconazole containing products are among the strongest tools currently available in Brazil for Post Bloom Fruit Drop. We would like to explore the possibility of pursuing a 24(c) for one of our tebuconazole containing formulations in Florida. The two formulations that we are considering for this submission are:

- Luna Experience (264-1091) (Fluopyram + Tebuconazole)
- Absolute 500 SC (264-849) (Trifloxystrobin + Tebuconazole)

All active ingredients have existing tolerances on oranges published in the CFR, however for tebuconazole, there are no US labels with citrus listed at this time, since the tolerance was established as an import tolerance. Current tolerances for tebuconazole are: 1.0 ppm for Orange and 10 ppm for Orange oil.

If you have a few minutes to discuss and can let us know of your availability, we would greatly appreciate it. Thanks in advance for your time and help... we are looking forward to talking to you.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709
Tel: +1 919 5492631
Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/27/2016 1:39:51 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Voluantary Cancellation of EPA SLN No. TX-150003
Attachments: TX150003_EPACancellationLtr_062216.pdf

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. TX-150003.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/27/2016 1:38:18 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: Voluntary Cancellation of EPA SLN No. PA-150003
Attachments: PA150003_EPACancellationLtr_062216.pdf

Letter attached.

From: Dinnen Pat USGR
Sent: Monday, June 27, 2016 9:36 AM
To: Maignan, Tawanda (Maignan.Tawanda@epa.gov)
Subject: Voluntary Cancellation of EPA SLN No. PA-150003

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. PA-150003.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 9/29/2016 7:18:37 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: NEW - WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of Ceanothus spe
Attachments: 62719_WA-160006_Apprvl_20160927.pdf; 62719_WA-160006_EPAform_20160927.pdf; 62719-702_Cleantraxx_20160628_WA-160006_62719_.pdf

Hello Tawanda,

Do we need to mail EPA a paper copy still?

Thank you,
Steve

From: Foss, Steve (AGR)
Sent: Wednesday, September 28, 2016 12:01 PM
To: 'Catherine H Daniels' <cdaniels@wsu.edu>; 'Lenora Jones' <lenora.jones@wsu.edu>; Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
Cc: 'Alan Schreiber' <aschreib@centurytel.net>; 'Ben Miller' <ben.miller@agri.idaho.gov>; 'David Priebe' <dpriebe@oda.state.or.us>; 'Doug Walsh' <dwalsh@wsu.edu>; 'Joe Herrera' <jherrera@yakama.com>; 'John Inouye' <jinouye@cdpr.ca.gov>; Ronda Brown (RR) (RRBrown2@dow.com) <RRBrown2@dow.com>; Peterson, Vanelle (VF) <VFPeterson@dow.com>; Wesley S. Wasson (wassonw@helenachemical.com) <wassonw@helenachemical.com>
Subject: NEW - WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of Ceanothus species

Attached is Washington Special Local Need (SLN) registration number WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of *Ceanothus* species.

Please contact me if you have any questions.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/27/2016 1:35:32 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Voluntary Cancellation of EPA SLN No. NJ-150003
Attachments: NJ150003_EPACancellationLtr_062216.pdf

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. NJ-150003.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/27/2016 1:31:58 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Voluntary Cancellation of EPA SLN No. MI-160001
Attachments: MI160001_EPACancellationLtr_062216.pdf

Flag: Flag for follow up

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. MI-160001.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/27/2016 1:27:29 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Voluntary Cancellation of EPA SLN No. FL-110001
Attachments: FL110001_EPACancellationLtr_062216.pdf

Flag: Flag for follow up

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. FL-110001.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Danyel Ward [danyel.ward@bayer.com]
Sent: 5/5/2016 9:04:41 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Danyel Ward [danyel.ward@bayer.com]
Subject: Bayer CropScience 24(c) Cancellation ME-070002
Attachments: 2016-05-05 24(c) EPA Cancellation Provado 1.6 ME-070002.pdf

Hi Tawanda,

Please see the attached letter cancelling 24(c) Special Local Need # ME-070002. Please let me know if you have any questions. Thanks!

Best regards,

Danyel Ward
Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park NC, 27709

Tel: +1 (919) 549-2303
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Mobile: +1 (919) 698-2784
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Message

From: Rose Kachadoorian [rkachadoorian@oda.state.or.us]
Sent: 6/22/2016 7:48:07 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Kraft, Erik [Kraft.Erik@epa.gov]
Subject: Glufosinate and glyphosate tolerant creeping bentgrass (GTCB): EPA requirements to possibly expand use
Attachments: GTBG Pics.docx; ATT00001.htm

We will see if Scotts actually collects the necessary data.
Rose

Begin forwarded message:

From: Rose Kachadoorian <rkachadoorian@oda.state.or.us>
Subject: Glufosinate and glyphosate tolerant creeping bentgrass (GTCB): EPA requirements to possibly expand use
Date: June 22, 2016 at 12:41:57 PM PDT
To: Bob Harriman <Bob.Harriman@Scotts.com>
Cc: "Diamond, Michael" <michael.diamond@scotts.com>, Lisa Hanson <lhanson@oda.state.or.us>, Ronald R Pence <rpence@oda.state.or.us>, Helmuth Rogg <hrogg@oda.state.or.us>, Ray Jaindl <raymond.g.jaindl@state.or.us>, "Buhrig, William" <William.Buhrig@oregonstate.edu>, Danyel Ward <danyel.ward@bayer.com>, Nancy K Osterbauer <nosterbauer@oda.state.or.us>, Carol Mallory-Smith <carol.mallory-smith@oregonstate.edu>, Sidney.W.Abel@aphis.usda.gov, Casey Prentiss <cprentiss@oda.state.or.us>

Bob,

I met with a number of people from EPA on June 16 in Washington D.C., regarding the potential use of glufosinate in/on the interior of irrigation canal/ditch banks when water is present to control GTCB. See attachment for an example of where GTCB may grow (I have many more photographs as examples). Note - these are older photographs and are representative of when population levels were higher; and prior to lengthy and highly coordinated control efforts by Scotts.

Currently, use is only allowed when the canals are "dry, drained and not in use", and water will not be introduced into canals for 14 days (see label for additional restrictions); Oregon Special Local Need (SLN) registration, FIFRA Sec. 24(c) OR-110006, http://cru66.cahe.wsu.edu/~picol/pdf/OR/55457.pdf

As you know, water from the canals/ditches is used to irrigate wheat, sugar beets, onions, alfalfa (hay and for seed), and other crops; many crops are sensitive to glufosinate exposure. The canals may also be used to provide drinking water for livestock, and irrigation for grass pastures.

ODA has the legal authority to grant a SLN; however, EPA has the authority to disallow a SLN that a state may grant. EPA does require data for a use pattern that is substantially different on a SLN label, than the use patterns on the EPA Stamped and Accepted label.

EPA has significant concerns about ODA possibly granting a SLN for the use of glufosinate in/on the interior of irrigation canal/ditch banks when water is present. Note -There used to be a label for the use of glufosinate in rice, but EPA had concerns regarding drinking water, and therefore the use has been discontinued.

Two Possibly Concepts to consider:
Concept 1: During the growing season, allow use if canal/ditch is temporarily drained, and water will not be introduced into canal/ditch for ?? days.
Concept 2: During the growing season, allow spot treatment to main irrigation canals and laterals while water is present, but not to ditches in farmer's fields while water is present.

In regard to Concept 2, on a basic level, EPA wants to know how many miles of canal/ditch will be treated and what percentage of the ditch will be treated. How much water is in the canal that may be contaminated with glufosinate , and what are the nearby crops which may be irrigated. Phytotoxicity to irrigated crops is a significant concern.

According to my notes, EPA would like to specially know/have (note - this list may expand, and includes the elements previously mentioned above):

- Degree of dilution
- Flow rate
- Depth of canal, and depth of water in canals
- Water Quality parameters such as organic carbon, pH, temperature range
- Diagram of the canals
- Will any of the water, including the Snake River, be used for human drinking water (another concern of EPA's).
- What percentage of the bentgrass is close to the water's edge
- Rate of application and application equipment used (pressure, droplet size etc.)

Bob, is Scotts taking the leadership role in collected the information required by EPA? If so, what time frame are you considering?

Thank you

Rose Kachadoorian
Pesticide Regulatory Leader
Pesticides Program
Oregon Department of Agriculture
635 Capitol St. NE, Salem, OR 97301
503/986-4651 Phone, 503/986-4735 Fax
Email: rkachadoorian@oda.state.or.us

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 6/22/2016 5:41:14 PM
To: 'Catherine H Daniels' [cdaniels@wsu.edu]; 'Lenora Jones' [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: 'Alan Schreiber' [aschreib@centurytel.net]; 'Ben Miller' [ben.miller@agri.idaho.gov]; 'David Priebe' [dpriebe@oda.state.or.us]; 'Doug Walsh' [dwalsh@wsu.edu]; 'Joe Herrera' [jherrera@yakama.com]; 'John Inouye' [jinouye@cdpr.ca.gov]; Meaghan Mitchell [meaghan.mitchell@bayer.com]
Subject: WA-930001 for use of Krovar I DF Herbicide (EPA Reg. No. 432-1551) to control weeds growing on the U.S. Army Yakima Firing Center Firebreaks
Attachments: 432-1551_WA-930001_Letter to EPA_20160622_Krovar I DF.pdf; 432-1551_Krovar I DF Herbicide_20160622_WA-930001_432_.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-930001 to Bayer Environmental Science for use of Krovar I DF Herbicide (EPA Reg. No. 432-1551) to control weeds growing on the U.S. Army Yakima Firing Center Firebreaks. EPA approved the transferred of WA-930001 from E. I. Du Pont de Nemours and Company to Bayer Environmental Science on April 27, 2015.

The label includes the following changes:

- The company name for the 24c registrant was changed to Bayer Environmental Science
- The EPA Reg No. was changed from 352-505 to 432-1551

Please contact me if you have any questions.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/22/2016 3:49:27 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: tony.cofer@agi.alabama.gov
Subject: Voluntary Cancellation of EPA SLN No. AL-110002
Attachments: AL110002_EPACancellationLtr_062216.pdf

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. AL-110002.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/22/2016 3:46:05 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Micah.Raub@vdacs.virginia.gov
Subject: Voluntary Cancellation of VA-150002
Attachments: VA150002_EPACancellationLtr_062216.pdf

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. VA-150002.

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 6/22/2016 3:39:05 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: tim.creger@nebraska.gov
Subject: Voluntary Cancellation of EPA SLN No. NE-150002
Attachments: NE150002_EPACancellationLtr_062216.pdf

Dear Ms. Maignan:

Please see attached Syngenta Crop Protection, LLC letter to voluntary cancel EPA SLN No. NE-150002

If you have questions or need additional information, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Simons, Eddie (AGR) [ESimons@agr.wa.gov]
Sent: 5/4/2016 5:51:12 PM
To: Daniels, Catherine Hollinger [cdaniels@wsu.edu]; Jones, Lenora J [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Alan Schreiber [aschreib@centurytel.net]; Ben Miller [ben.miller@agri.idaho.gov]; Dave Priebe [dpriebe@oda.state.or.us]; Doug Walsh [dwalsh@wsu.edu]; Joe Herrera [jherrera@yakama.com]; John Inouye [jinouye@cdpr.ca.gov]
Subject: WA-160004 New 24c for Proline 480 SC in Spinach Grown for Seed
Attachments: WA-160004_Apprvl_20160504.pdf; WA-160004_EPA Form_20160504.pdf; 264-825_Proline 480 SC_20160503_WA-160004_264_.pdf

Please see the attached new 24c Special Local Need registration.

WA-160004 Proline 480 SC Fungicide (EPA Reg# 264-825)
For Suppression of Fusarium Wilt (Fusarium spp.) in Spinach Grown For Seed

Regards,

Eddie Simons
Registration Specialist

Washington State Department of Agriculture
Pesticide Management Division
Phone: 360.902.2031
email: esimons@agr.wa.gov

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 5/24/2016 7:51:52 PM
To: Catherine H Daniels [cdaniels@wsu.edu]; Lenora Jones [lenora.jones@wsu.edu]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Alan Schreiber [aschreib@centurytel.net]; Ben Miller [ben.miller@agri.idaho.gov]; David Priebe [dpriebe@oda.state.or.us]; Doug Walsh [dwalsh@wsu.edu]; Joe Herrera [jherrera@yakama.com]; John Inouye [jinouye@cdpr.ca.gov]; Kristen Shears (kshears@dow.com) [kshears@dow.com]
Subject: Revised SLN for WA-140004 for use of Entrust SC on blueberries | 1 day PHI
Attachments: 62719-621_Entrust SC_20160524_WA-140004_62719_.pdf; WA-140004_Entrust SC_20160524.pdf

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-140004 to Dow AgroSciences for use of Entrust SC (EPA Reg. No. 62719-621) on blueberries to control the Spotted Wing Drosophila (SWD).

Please contact me if you have any questions.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Sent: 5/23/2016 9:29:27 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Petrella, Carlyn [Petrella.Carlyn@epa.gov]; Walsh, Michael [Walsh.Michael@epa.gov]
Subject: Entrust SC (EPA Reg. No. 62719-621) - SLN request in WA to reduce PHI from 3 days to 1 day in bushberries (subgroup 13b)
Attachments: 06 SPINOSAD MAGNITUDE OF THE RESIDUE ON THE BLUEBERRY.PDF

Importance: High

Afternoon,

Dow AgroSciences LLC is requesting a Sec. 24(c) registration in Washington for Suppression of Spotted Wing Drosphila and Reduced PHI in Bushberries (Subgroup 13B).

Dow AgroSciences is proposing to reduce the PHI for bushberries from 3 days to 1 day. The reduction in the PHI has been requested from blueberry growers in order to combat Spotted Wing Drosphila.

Does the previously submitted magnitude of residue for blueberries (Spinosad: Magnitude of Residue on Blueberry: MRID 45311701) supported a 1 day PHI while maintaining the same established tolerance for bushberries of 0.40 ppm?

WA-140004 currently allows use of Entrust SC on blueberries only (not bushberries-Subgroup 13B) with a 3 day PHI.

Has Dow AgroSciences submitted the requested change in PHI from 3 days to 1 day as a section 3 amendment? This change did not happen on the last label revision https://www3.epa.gov/pesticides/chem_search/ppls/062719-00621-20160128.pdf.

Thank you for your assistance.

Regards,
Steve

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Shears, Kristen (K) [mailto:kshears@dow.com]
Sent: Monday, April 25, 2016 12:29 PM
To: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Subject: Dow AgroSciences Entrust SC Special Local Need Request

Steve:

I have attached a zip file of the pdfs for our Special Local Need submission that I referenced last week. One file is of significant size, hence the zip file. Please let me know if you have any issues with the files.

Best,

Kristen Shears Regulatory Specialist
Office: 317.337.4791 kshears@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

www.dowagro.com | Facebook | Twitter | YouTube

Dow AgroSciences | *Solutions for the Growing World*

Message

From: Dinnen Pat USGR [pat.dinnen@syngenta.com]
Sent: 11/1/2018 7:33:45 PM
To: amy.brown@freshfromflorida.com; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: Syngenta 24(c) Cancellation Request - Manuscript - EPA SLN No. FL-180003
Attachments: FLManuscriptSLN_FL-180003_CancelLtr_11-01-18.pdf

Please see attached letter requesting cancellation of EPA SLN No. FL-180003 for Manuscript.

If you have any questions, please do not hesitate to call me at 336-632-2494 or email me at pat.dinnen@syngenta.com.

Thanks,
Pat

Patricia Dinnen, Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 6/27/2018 2:11:26 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]
Subject: FW: Revised WA-940038 issued to Dow AgroSciences LLC for use of Telone II to suppress certain perennial weeds in cropland
Attachments: WA-940038_Telone II_20180626.pdf; 62719-32_Telone II_20180626_WA-940038_62719_.pdf

FYI

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]
Sent: Tuesday, June 26, 2018 1:44 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; 'cdaniels@wsu.edu' <cdaniels@wsu.edu>; lenora.jones@wsu.edu
Cc: Personal Email / Ex. 6; 'dwalsh@wsu.edu' <dwalsh@wsu.edu>; jherrera@yakama.com; 'John Inouye (jinouye@cdpr.ca.gov)' <jinouye@cdpr.ca.gov>; gjackson@oda.state.or.us; 'sherman.takatori@isda.idaho.gov' <sherman.takatori@isda.idaho.gov>; Shears, Kristen (K) <kshears@dow.com>; Timothy D. Waters (twaters@wsu.edu) <twaters@wsu.edu>; mblua@potatoes.com
Subject: Revised WA-940038 issued to Dow AgroSciences LLC for use of Telone II to suppress certain perennial weeds in cropland

The Washington State Department of Agriculture issued a revised label for Washington Special Local Need (SLN) registration number WA-940038 to Dow AgroSciences LLC for the use of Telone II (EPA Reg. 62719-32) to suppress certain perennial weeds in cropland.

Please contact me if you have any questions.

Regards,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 3/27/2018 7:22:32 PM
To: Jessica Fernandez [jessica.fernandez@bayer.com]; Johnson, Hope [Johnson.Hope@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]; Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
CC: John.Inouye@cdpr.ca.gov; Christine Villegas [christine.villegas@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I have not received any feedback at the moment and I do apologize for the delay. A message has been sent to ChemSac's attention inquiring on the status. Once I learn more I will let you know.

Thank you for your patience.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709

United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch

Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

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The information contained in this e-mail is for the exclusive use of the intended recipient(s) and may be confidential, proprietary, and/or legally privileged. Inadvertent disclosure of this message does not constitute a waiver of any privilege. If you receive this message in error, please do not directly or indirectly use, print, copy, forward, or disclose any part of this message. Please also delete this e-mail and all copies and notify the sender. Thank you.

The information contained in this e-mail is for the exclusive use of the intended recipient(s) and may be confidential, proprietary, and/or legally privileged. Inadvertent disclosure of this message does not constitute a waiver of any privilege. If you receive this message in error, please do not directly or indirectly use, print, copy, forward, or disclose any part of this message. Please also delete this e-mail and all copies and notify the sender. Thank you.

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 3/27/2018 9:50:56 PM
To: Olinger, Christine [Olinger.Christine@epa.gov]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thanks Chris!

From: Olinger, Christine
Sent: Tuesday, March 27, 2018 5:41 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Tawanda –
I found the email I sent to George and I couldn't find a response from him. I sent a note to him (he had already left by the time I made it back upstairs), so will check in with him first thing.

Chris O.

Christine Olinger
Chief, Risk Assessment Branch I
Office of Pesticide Programs Health Effects Division
US Environmental Protection Agency
1200 Pennsylvania Ave NW MailCode 7509P
Washington DC 20460
Office Location: Potomac Yard South Room 10751
Phone: 703-305-5406
FAX: 703-305-5147
olinger.christine@epa.gov

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 4:52 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Ok, I will patiently await for feedback.

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 4:04 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

We still need a RAB1 chemist to take it through the committee. It is best to use the ChemSAC process to get the response.

-Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 3:37 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Julie –

I appreciate your message. I sent an email on February 21st requesting review (please attached). I had hoped this was already raised at ChemSac and would be receiving a response by now. In light of this gap in time, is it possible for ChemSac to review this without going through the formalities.

I thank you in advance for your consideration of my request.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 3:29 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

It looks like RAB1 needs to bring it through ChemSAC. The committee hasn't discussed it yet. Typically, the requests go to the branches and the branches are responsible for bringing the items through ChemSAC.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 2:58 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus
Importance: High

Hi Julie –

Following up on whether or not you all have been able to make a determination on the request at the beginning of this email. I also provided data. I look forward to your feedback.

Many thanks –
Tawanda

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM

To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these

type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

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Crop Science, Crop Science
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2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

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RTP NC 27709
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Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Crop Science, Crop Science
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Research Triangle Park, NC 27709

Tel: +1 919 549 2631

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E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

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Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to

reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Crop Science, Crop Science
Registrations
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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

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Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>

Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
2 T.W. Alexander Drive
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Tel (office): +1 919.549.5355
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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 3/27/2018 7:37:28 PM
To: VanAlstine, Julie [VanAlstine.Julie@epa.gov]
CC: Olinger, Christine [Olinger.Christine@epa.gov]; Kramer, George [Kramer.George@epa.gov]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus
Attachments: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Julie –

I appreciate your message. I sent an email on February 21st requesting review (please attached). I had hoped this was already raised at ChemSac and would be receiving a response by now. In light of this gap in time, is it possible for ChemSac to review this without going through the formalities.

I thank you in advance for your consideration of my request.
Regards –
Tawanda

Tawanda Maignan, Acting Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: VanAlstine, Julie
Sent: Tuesday, March 27, 2018 3:29 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

It looks like RAB1 needs to bring it through ChemSAC. The committee hasn't discussed it yet. Typically, the requests go to the branches and the branches are responsible for bringing the items through ChemSAC.

Thanks,

Julie

Julie L. Van Alstine
Risk Assessment Branch 6
Health Effects Division
Office of Pesticide Programs
703-603-8866

From: Maignan, Tawanda
Sent: Tuesday, March 27, 2018 2:58 PM
To: VanAlstine, Julie <VanAlstine.Julie@epa.gov>
Cc: Olinger, Christine <Olinger.Christine@epa.gov>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus
Importance: High

Hi Julie –

Following up on whether or not you all have been able to make a determination on the request at the beginning of this email. I also provided data. I look forward to your feedback.

Many thanks –
Tawanda

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Tuesday, March 27, 2018 2:24 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if there has been any feedback or if ChemSAC has had a chance to weigh in on this topic.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

//////////////////

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2 T.W. Alexander Dr.
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United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, February 22, 2018 7:48 AM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – thanks for getting back to me and I appreciate anything you can do to look into our questions. In regards to CA DPR, my colleague Christie Villegas did reach out to John Inouye as a first step when we started the process of determining the needed steps for this request. There is an email dated May 24, 2017 in the email trail below, where John replied to Christie's initial inquiry and he recommended that we contact the Federal Product Manager for

Pyrimethanil. For easy reference, I've pasted John's response below (using italics) and I've also highlighted his response in the original email which you can see if you scroll below (since this email trial is long, the May 24 email is a bit far down). Thanks again for taking a look at this and let us know if there is any additional information or clarity we can provide.

Reply from CDPR (John Inouye) to Bayer (email dated May 24, 2017; can be seen if you scroll down on this email trail):

"Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John"

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
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2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Wednesday, February 21, 2018 4:57 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica –

I appreciate your message, unfortunately I do not have an update for you at this time. I will do what I can to offer feedback soon. Meanwhile, I am curious as to the position of CA DPR with respect to a 24(c) for this use pattern. As you are aware, 24(c)s are state registrations and we provide minimal oversight. In the future, these type of inquiries should come from the state seeking the 24(c) and/or S18, my apologies for not bringing this to your attention before.

Regards –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch

Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Wednesday, February 21, 2018 12:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda – just checking if you've had a chance to take a look at the attachments that were included with the email below, or if you've shared the information with ChemSAC. Any updates or additional information you can provide would be helpful. Thanks.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

////////////////////

Bayer U.S. LLC
Crop Science, Crop Science
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2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the

tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

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Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

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- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.

- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
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Tel (office): +1 919.549.5355
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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 1/30/2018 5:39:02 PM
To: Louie-Juzwiak, Rosanna [Louie-Juzwiak.Rosanna@epa.gov]; Finn, Cara [Finn.Cara@epa.gov]
CC: Bryceland, Andrew [Bryceland.Andrew@epa.gov]
Subject: RE: New crop opportunities in Hawaii

Hi Cara – I second Rosanna's sentiments.

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Louie-Juzwiak, Rosanna
Sent: Tuesday, January 30, 2018 12:36 PM
To: Finn, Cara <Finn.Cara@epa.gov>
Cc: Bryceland, Andrew <Bryceland.Andrew@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Hi Cara – that is a reasonable request to make of her, to at least work in identifying representatives. At this point, it sounds like at least Tawanda and Andrew…

Rosanna

From: Finn, Cara
Sent: Tuesday, January 30, 2018 12:34 PM
To: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Cc: Bryceland, Andrew <Bryceland.Andrew@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Hi Rosanna,

Do you think we should give her a deadline to offer an agenda before it cuts it too close for us to arrange a meeting?

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division
US EPA Office of Pesticide Programs
Office Phone: 703-305-5659
Work Cell: 703-489-6207

From: Louie-Juzwiak, Rosanna
Sent: Tuesday, January 30, 2018 9:40 AM
To: Finn, Cara <Finn.Cara@epa.gov>
Cc: Bryceland, Andrew <Bryceland.Andrew@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Hi Cara,

I have not heard anything; I'm assuming she'd reply back to the initial list of folks.

I've copied Tawanda here; to an earlier note, if it may entail some discussion on minor use consideration (or if I recall, SLN was raised as a suggested option by someone in BPPD), she is currently the acting chief of that branch, and should be the point of contact.

-Rosanna

From: Finn, Cara
Sent: Tuesday, January 30, 2018 9:37 AM
To: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Cc: Bryceland, Andrew <Bryceland.Andrew@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Hi Rosanna,

We're cutting it close to the wire to schedule anything – have you heard back? Thanks!

I have cced Andy Bryceland, who will likely represent BPPD, if BPPD representation is needed and his schedule allows.

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division
US EPA Office of Pesticide Programs
Office Phone: 703-305-5659
Work Cell: 703-489-6207

From: Louie-Juzwiak, Rosanna
Sent: Thursday, January 25, 2018 10:09 AM
To: Finn, Cara <Finn.Cara@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Nothing yet, on my end.
Likely, this will go to Tawanda… but I will let you know if I hear anything!

From: Finn, Cara
Sent: Thursday, January 25, 2018 10:08 AM
To: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Have you heard back on an agenda? I haven't been able to identify someone from BPPD yet, but I'll try again today.

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division
US EPA Office of Pesticide Programs
Office Phone: 703-305-5659
Work Cell: 703-489-6207

From: Louie-Juzwiak, Rosanna
Sent: Wednesday, January 24, 2018 1:54 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Finn, Cara <Finn.Cara@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Will do – thanks,

Rosanna

From: Maignan, Tawanda
Sent: Wednesday, January 24, 2018 1:42 PM
To: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Cc: Finn, Cara <Finn.Cara@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Rosanna – Thanks for the heads up and please feel free to share my information so that Mae can contact me directly.

Tawanda Maignan
Acting Chief, Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Louie-Juzwiak, Rosanna
Sent: Tuesday, January 23, 2018 9:42 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: New crop opportunities in Hawaii

Tawanda,

An FYI at the moment, as the direction is still unclear on what this entity is interested in pursuing, but it's looking like RD should be involved, and you could help answer many of these general registration questions, options, being a potential minor crop, etc.

Cara mentioned that another in BPPD suggested to her that the SLN route (another reason to tag you) would be an option in producing the pongamia crop... [I told Cara my concerns about this bypassing of the registration process, and recommended to wait until the meeting before identifying any options or suggestions].

Finally, at least Mae is scheduled to be in DC on February 2nd, and asked to set up a meeting. Once information is more concrete and more likely an RD meeting, I will pass it along.

-Rosanna

From: Louie-Juzwiak, Rosanna
Sent: Tuesday, January 23, 2018 9:29 AM
To: Finn, Cara <Finn.Cara@epa.gov>; Mae Nakahata Personal Email / Ex. 6
Cc: Ray McAllister <rmcallister@croplifeamerica.org>; Jeff Case <jcase@croplifeamerica.org>
Subject: RE: New crop opportunities in Hawaii

Hello Mae,

To add to Cara's information/questions, the following information may help you have a more informative meeting, as you develop your agenda and any questions:

- In growing/production of the pongamia tree crop, what pest(s) do you believe need to be controlled (*e.g.*, weeds, insects, fungal diseases, etc.), or do you have an idea of what pesticide products you may consider, to pursue a registration for use on growing pongomia?
- When extracting/producing pongamia oil, is there any plan on uses with the spent pongamia (seed) material, such as for animal feed?
- If pursuing the extracted pongamia oil as a potential biopesticide (pending EPA's review and classification), what are some potential uses of that pongamia oil (*e.g.*, on growing crops, ornamental plants, building structures, etc.)? Also, any data you have to speak to its toxicity to humans/wildlife/plants, or its exposure to people and the environment

We hope this is helpful, and your feedback will help us better identify the staff that can more readily answer your questions.
Regards,
Rosanna

From: Finn, Cara
Sent: Tuesday, January 23, 2018 8:40 AM
To: Mae Nakahata Personal Email / Ex. 6
Cc: Ray McAllister <rmcallister@croplifeamerica.org>; Jeff Case <jcase@croplifeamerica.org>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Subject: RE: New crop opportunities in Hawaii

Hello,

If you could provide me with a specific agenda, keeping in mind that the registration process would only be able to be discussed in generalities, that would greatly assist me in determining who to arrange a meeting with. Thank you.

Also – is the morning of February 2nd your only availability during your trip? That will inform who on our end is available to meet.

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division
US EPA Office of Pesticide Programs
Office Phone: 703-305-5659
Work Cell: 703-489-6207

From: Mae Nakahata [mailto: Personal Email / Ex. 6
Sent: Monday, January 22, 2018 5:40 PM
To: Finn, Cara <Finn.Cara@epa.gov>
Cc: Ray McAllister <rmcallister@croplifeamerica.org>; Jeff Case <jcase@croplifeamerica.org>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Jones, Russell <Jones.Russell@epa.gov>
Subject: RE: New crop opportunities in Hawaii

thank you for the information. Located as far away from DC as possible, it is not often I get to the east coast and have found that knowing the people facilitates conversations.
The intent of this trip is to get the big picture and who we need to work with as we embark on this path.
I will appreciate meeting the key players if possible.

thank you.
mae

On Jan 22, 2018 11:02 AM, "Finn, Cara" <Finn.Cara@epa.gov> wrote:

Hello Mae,

We are happy to meet with you. However, before we can schedule a meeting with you to discuss the registration process and requirements for registration, the pongamia oil must go through the process of being classified as either a biochemical pesticide or a conventional pesticide by our Biochemical Classification Committee. We require this classification of all new active ingredients prior to arranging a meeting, so that we can provide you with accurate information, as it differs depending on the classification of the active ingredient.

We understand that the time frame for classification (approximately 30-45 days) will take us past February 2nd, but we will be happy to schedule a teleconference with you and the appropriate staff once the classification has been determined, should an in-person meeting be unrealistic.

Russell Jones (jones.russell@epa.gov) is your contact for this process.

You must provide the committee with the following information:

1) Is the active ingredient a naturally occurring compound?

2) What is the mode of action (the purpose in formulation of each active ingredient, and how does it works against the target pest)?

3) What is the history of exposure (i.e., have humans been exposed to these active ingredients)?

You will find more information attached on submitting your ingredient to the committee.

While you are awaiting a classification, here are some links to material you may find informative to review:

- Conventional Pesticide Registration: https://www.epa.gov/pesticide-registration/conventional-pesticide-registration

- Biopesticide Registration: https://www.epa.gov/pesticide-registration/biopesticide-registration

- Pesticide Registration Manual: https://www.epa.gov/pesticide-registration/pesticide-registration-manual

- PRIA Fees (Cost of Registration and Time Frame):

    - Conventional: https://www.epa.gov/pria-fees/fy-201617-fee-schedule-registration-applications#registration

    - Biopesticide: https://www.epa.gov/pria-fees/fy-201617-fee-schedule-registration-applications#biopesticides

    - PRIA Fee Determination Tree: https://www.epa.gov/pria-fees/pria-3-fee-determination-decision-tree

    - Small Business Fee Waivers: https://www.epa.gov/pria-fees/pria-fee-waivers-small-businesses

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division

US EPA Office of Pesticide Programs
Office Phone: 703-305-5659

Work Cell: 703-489-6207

From: Mae Nakahata [mailto: Personal Email / Ex. 6
Sent: Monday, January 22, 2018 12:45 PM
To: Finn, Cara <Finn.Cara@epa.gov>
Cc: Ray McAllister <rmcallister@croplifeamerica.org>; Jeff Case <jcase@croplifeamerica.org>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>
Subject: RE: New crop opportunities in Hawaii

thank you everyone for your assistance. In a nutshell the reply is all.

I am the one that started this request.

I am the agronomist for A&B Diversified, seeking to replace 36000 acres of lands that formerly grew sugarcane.

it has been difficult and moving forward will require that the ultimate use of the crops can make or break a crops future, especially for tree crops that require long term investments. We also need to access pesticides as pongamia being a new crop is not on any label.

One of our crops is pongamia, an oilseed tree with indications of biopesticidal capacities.

if this capacity can be developed at a reasonable cost, it will make a big difference on the balance sheet. neither our partner Terviva that has developed the crop nor we that will grow the crop have experience in this area and need help in understanding the process for planning purposes. we have meetings w IR4 but know that this area is evolving so am seeking counsel with EPA, the final authority in this area. first of all, is it reasonable for us to pursue this effort.

we are not associated with any pesticide company tho I have worked with many of them in the past and hence sought the counsel of Ray McAllister.

Hope this helps. Thank you.o

Mae

On Jan 22, 2018 2:50 AM, "Finn, Cara" <Finn.Cara@epa.gov> wrote:

Hello,

Apologies, one more question so I connect you with the person with the right expertise – what questions do you have about registering a biochemical pesticide that you would like addressed in the meeting? Thank you.

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division

US EPA Office of Pesticide Programs
Office Phone: 703-305-5659

Work Cell: 703-489-6207

From: Louie-Juzwiak, Rosanna
Sent: Monday, January 22, 2018 7:14 AM
To: Ray McAllister <rmcallister@croplifeamerica.org>; Finn, Cara <Finn.Cara@epa.gov>; Jeff Case <JCase@croplifeamerica.org>
Cc: Mae Nakahata <Personal Email / Ex. 6

Subject: RE: New crop opportunities in Hawaii

Hello Ray,

Thank you for the background information for pongamia.

Thanks Cara for your follow up on this.

Regards,

Rosanna

From: Ray McAllister [mailto:RMcAllister@croplifeamerica.org]
Sent: Friday, January 19, 2018 5:17 PM
To: Finn, Cara <Finn.Cara@epa.gov>; Jeff Case <JCase@croplifeamerica.org>
Cc: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Mae Nakahata Personal Email / Ex. 6
Subject: RE: New crop opportunities in Hawaii

Pongamia is a tree crop, which produces an oil with potential pesticidal properties. So it would be a biochemical.

Ray S. McAllister, PhD

Senior Director Regulatory Policy

CropLife America

O: 202-872-3874 C: 202-577-6657

ray@croplife.us

From: Finn, Cara [mailto:Finn.Cara@epa.gov]
Sent: Friday, January 19, 2018 3:20 PM
To: Jeff Case <JCase@croplifeamerica.org>; Ray McAllister <RMcAllister@croplifeamerica.org>
Cc: Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Mae Nakahata Personal Email / Ex. 6
Subject: RE: New crop opportunities in Hawaii

Hello,

I am investigating who in the Biopesticide Division is the best contact for such a meeting. Would you happen to know if the potential biopesticidal use of *Pongamia* would be categorized as a biochemical or as a microbial? Thank you.

Cara Finn, Ombudsman
Biopesticides and Pollution Prevention Division

US EPA Office of Pesticide Programs
Office Phone: 703-305-5659

Work Cell: 703-489-6207

From: Jeff Case [mailto:JCase@croplifeamerica.org]
Sent: Friday, January 19, 2018 2:36 PM
To: Ray McAllister <rmcallister@croplifeamerica.org>
Cc: Finn, Cara <Finn.Cara@epa.gov>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Mae Nakahata Personal Email / Ex. 6
Subject: Re: New crop opportunities in Hawaii

Ray,

Thanks for your efforts to work with Mae on this.

Jeff

On Jan 19, 2018, at 1:06 PM, Ray McAllister <RMcAllister@croplifeamerica.org> wrote:

> Rosanna & Cara:
>
> Mae Nakahata from Hawaii (copied here) is investigating new crops to grow on land previously used for sugarcane and pineapples, now largely phased out. We would like to meet with you folks during her visit to Washington DC, to discuss concerns about pesticide use registrations for novel minor crops, and the potential biopesticidal use of one specific crop (pongamia).

Are you the right folks to talk to? If so, would you have time to visit on the morning of February 2 (assuming there is no government shutdown in effect)? If not, can you point us in the right direction?

Ray S. McAllister, PhD

Senior Director Regulatory Policy

CropLife America

O: 202-872-3874 C: 202-577-6657

ray@croplife.us

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 8/2/2018 9:23:04 PM
To: Green, Christopher [Green.Christopher@epa.gov]
Subject: FW: Cancellation of SLN ME-160002
Attachments: Omega Maine SLN Canc 08012018.pdf

Chris – The attached letter was sent in support of the voluntary cancellation of SLN ME160002. The 180 day comment period has been waived.

Tawanda Maignan
Emergency Response Team Leader
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Peplowski, Mike [mailto:PeplowskiM@iskbc.com]
Sent: Wednesday, August 01, 2018 2:18 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>; Tomlinson, Mary E <Mary.E.Tomlinson@maine.gov>
Subject: Cancellation of SLN ME-160002

Dear Tawanda,

This is to notify you that the Maine SLN for Omega 500F, ME-160002 expired on December 31, 2017 and that a decision was made not to renew it.
Attached please find a cancellation letter for your files.

Best regards,
Mike

Michael A. Peplowski
***ISK* BIOSCIENCES CORPORATION**
Manager, Product Registrations & Quality Assurance
7470 Auburn Road, Suite A
Concord, OH 44077

Phone: 440-357-4653

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 8/2/2018 9:21:26 PM
To: Peplowski, Mike [PeplowskiM@iskbc.com]
CC: Dinnen Pat USGR [pat.dinnen@syngenta.com]; Tomlinson, Mary E [Mary.E.Tomlinson@maine.gov]
Subject: RE: Cancellation of SLN ME-160002

Mike –
Thanks for bringing this too our attention. I will route the voluntary cancellation letter for proper processing.

Regards –
Tawanda

From: Peplowski, Mike [mailto:PeplowskiM@iskbc.com]
Sent: Wednesday, August 01, 2018 2:18 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Dinnen Pat USGR <pat.dinnen@syngenta.com>; Tomlinson, Mary E <Mary.E.Tomlinson@maine.gov>
Subject: Cancellation of SLN ME-160002

Dear Tawanda,

This is to notify you that the Maine SLN for Omega 500F, ME-160002 expired on December 31, 2017 and that a decision was made not to renew it.
Attached please find a cancellation letter for your files.

Best regards,
Mike

Michael A. Peplowski
***ISK* BIOSCIENCES CORPORATION**
Manager, Product Registrations & Quality Assurance
7470 Auburn Road, Suite A
Concord, OH 44077

Phone: 440-357-4653

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 2/21/2018 10:19:27 PM
To: Olinger, Christine [Olinger.Christine@epa.gov]
CC: VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Kramer, George [Kramer.George@epa.gov]
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus
Attachments: 2018-01-05 Rationale to support pyrimethanil use in mandarins.docx; Bayer Crop Science 1172018.docx

Chris & ChemSac,

Below is a message I received from Bayer regarding the use of pyrimethanil on citrus crop group 10-10 under a 24(c) registration. It is my understanding that is already an established tolerance, however, my concern was whether or not it covered the proposed use pattern under the 24(c). This is where you all come in. I would greatly appreciate if you could review the attached information and provide your feedback on this inquiry. Please do not conduct a full assessment as a quick email evaluation would be sufficient. I thank you in advance for your attention to this matter.

Thanks,
Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Monday, January 22, 2018 3:31 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Tawanda,

Last year, Bayer reached out to the Agency to seek guidance on a request received from Citrus Mutual, for a 24(c) for our Scala Brand Fungicide (264-788) on citrus, for in-field use. In summary, there is an existing tolerance for Pyrimethanil on citrus crop group 10-10, based on a post-harvest use currently registered to Janssen Pharmaceutica. In our last communication (emails found below), you explained that it would be helpful to have additional information and clarity in regards to the use pattern being sought and that it would also be helpful if Bayer could review the existing data and provide a rationale as to why the tolerance would not be impacted by the proposed 24(c). We would like to revisit this discussion and have included a rationale (attached), as well as a letter from California Citrus Mutual, where they provide further information highlighting the need for the 24(c).

We were hoping you could take a look at the rationale attached, and share with ChemSAC if needed, and let us know if the Agency sees an opportunity for establishing the 24(c) based on the existing crop group 10-10 tolerance.

Thank you in advance for looking into this and please let me know if additional information is needed.

Freundliche Grüße / Best regards,

Jessica Fernandez
Federal Registrations

//////////////////

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Dr.
RTP NC 27709
United States

Mobile: +1 919 475-1100
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.us

From: Jessica Fernandez
Sent: Thursday, May 25, 2017 3:10 PM
To: 'Maignan, Tawanda'; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Tawanda. I will consult with our dietary expert for his evaluation of the data.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, May 25, 2017 2:21 PM
To: Jessica Fernandez; Johnson, Hope; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3

registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC

Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel (office): +1 919.549.5355
Tel (cell): +1 919.475.6959
Fax: +1 919.549.2905

christine.villegas@bayer.com

Web: http://www.bayer.com

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 10/24/2017 5:13:29 PM
To: Inouye, John@CDPR [John.Inouye@cdpr.ca.gov]; Green, Christopher [Green.Christopher@epa.gov]; 'matt.flanery@syngenta.com' [matt.flanery@syngenta.com]
Subject: RE: VOLUNTARY CANCELLATION REQUEST - EPA SLN REG. # CA-110006

John,

Thanks for your response. However, we need Syngenta's concurrence on the waiver of the 180-day public comment period.

Regards,
Tawanda

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Tuesday, October 24, 2017 1:08 PM
To: Green, Christopher <Green.Christopher@epa.gov>; 'matt.flanery@syngenta.com' <matt.flanery@syngenta.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: VOLUNTARY CANCELLATION REQUEST - EPA SLN REG. # CA-110006

Chris-

California request to waive the comment period.

John E. Inouye
Senior Environmental Scientist
Pesticide Registration Branch
(916) 324-3538
E-mail: John.Inouye@cdpr.ca.gov

From: Green, Christopher [mailto:Green.Christopher@epa.gov]
Sent: Tuesday, October 24, 2017 9:53 AM
To: matt.flanery@syngenta.com
Cc: Inouye, John@CDPR; Maignan, Tawanda
Subject: VOLUNTARY CANCELLATION REQUEST - EPA SLN REG. # CA-110006

John/Matt/Tawanda,

I received the Voluntary Cancellation request for the subject registration, however, do you also request to waive the 180-day comment period?

Chris Green
Information Services Branch
Information Technology and Resources Management Division
US Environmental Protection Agency
Green.Christopher@epa.gov

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 2/15/2018 10:24:32 PM
To: Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]; Kish, Tony [Kish.Tony@epa.gov]
Subject: RE: Paclobutrazol- SLN pre-submission request for ChemSAC Review of "Non-food" Use in Corn

Hi Cynthia –

I appreciate FB taking the lead on submitting the request through ChemSAC. As for the 24(c), the company is welcome to contact me, however, I will likely direct them to the State as they are regulatory authority. That said, I agree with this approach as previously shared verbally.

Thanks –
Tawanda

Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Giles-Parker, Cynthia
Sent: Wednesday, February 14, 2018 8:57 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Kish, Tony <Kish.Tony@epa.gov>
Cc: Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: RE: Paclobutrazol- SLN pre-submission request for ChemSAC Review of "Non-food" Use in Corn

Hello Tawanda,

We can ask ChemSac to review the request to determine whether it is non-food use. I believe that is the only thing we can do at this point. The determination on whether they can have a 24(c) may be one of Monsanto's other questions which I think your branch would handle later or we could have them contact you about a possible SLN. Let me know if you agree with this approach.

Cynthia

From: Maignan, Tawanda
Sent: Tuesday, February 13, 2018 5:36 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: RE: Paclobutrazol- SLN pre-submission request for ChemSAC Review of "Non-food" Use in Corn

Hi Tony –

We do not conduct pre-submission determinations for SLNs. If ChemSAC needs to review this then it should come under PRIA/PM Team. Last but not least, Nancy is the Minor Use team Leader and does not handle 24(c)s. Let me know if you would like to discuss further.

Thanks --
Tawanda Maignan, *Acting* Chief
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Kish, Tony
Sent: Tuesday, February 13, 2018 12:01 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>
Subject: Paclobutrazol- SLN pre-submission request for ChemSAC Review of "Non-food" Use in Corn

Hi Tawanda- Per attached file, Monsanto is requesting a SLN pre-submission determination from ChemSAC. This fits with your SLN group activities so let me know if you agree to handle this action as he was advised to contact me first, and I can advise him to contact your team. Seems like making a ChemSAC pre-SLN determination now w/o the SLN label, will be about equal level of effort to make the determination if they actually submit the SLN, so I don't know why they don't just submit the SLN.

Thanks, Tony

From: Davis, Donna
Sent: Tuesday, February 13, 2018 6:06 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

I think the current ChemSAC co chairs are Julie VanAlstine and George Kramer.

From: Kish, Tony
Sent: Monday, February 12, 2018 5:33 PM
To: Davis, Donna <Davis.Donna@epa.gov>
Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

Hi Donna- Who in HED now handles ChemSAC requests?

From: Davis, Donna
Sent: Monday, February 12, 2018 1:00 PM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

It also has a PGR use. I recall that they wanted to use it with tree nuts to stunt the growth of the trees and minimize the need to prune around electrical lines.

From: Kish, Tony
Sent: Thursday, February 08, 2018 6:33 PM
To: Davis, Donna <Davis.Donna@epa.gov>
Subject: RE: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

OK will do next week. He calls paclobutrazol a PGR but it's a fungicide.

From: Davis, Donna
Sent: Thursday, February 08, 2018 6:07 PM
To: Kish, Tony <Kish.Tony@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Subject: FW: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

James called about this issue. I suggested that he send it in through the PM, as it sounded like a ChemSAC issue. Let me know if you have any issues getting it reviewed when you send it up to RAB6 and maybe I can help to move it along.
Thanks,
Donna

From: NYANGULU, JAMES M [AG/1920] [mailto:james.m.nyangulu@monsanto.com]
Sent: Thursday, February 08, 2018 9:03 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Cc: Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
Subject: Request for ChemSAC Review of Paclobutrazol as "Non-food" Use in Corn

Hi Tony,
On behalf of Monsanto, I am submitting a request for ChemSAC review to consider the use of a FIFRA-regulated plant growth regulator (active ingredient paclobutrazol) in corn seed production, in protected culture (i.e. greenhouse) as non-food use. EPA regulations allow pesticide use on crops grown to produce seed specifically for crop reproduction purposes to be considered "nonfood and nonfeed use" if no parts of the crop are diverted for food or feed use and there is no likelihood of residues in crops grown from harvested seed [OPPTS 860.1000(e)(B)(1)]. Full details of our request have been provided in the attachment.

Monsanto is intending to pursue a 24(c) registration to enable paclobutrazol use for seed production purposes. The proposed 24(c) registration will restrict the PGR use to corn seed production at Monsanto's greenhouse facility built and managed to meet NIH guidelines and USDA confinement requirements which are designed to prevent any materials from entering food or feed channels. The 24(c) label will clearly prohibit that any parts of the corn crop be diverted for human food or livestock feed. Corn seed produced at this greenhouse facility will be used for plantings only and will bear tags or container labels which clearly forbids use for human consumptions and animal feed.

Monsanto strongly believes that this PGR use in corn for seed production meets requirements for "nonfood use" and can be appropriately stewarded. Monsanto respectfully requests the review of this matter by ChemSAC and welcomes the opportunity to discuss this proposed nonfood use in more detail. Should you have questions or need additional information please don't hesitate to contact me or Dr Simone Seifert-Higgins at (636) 737-9571 or simone.seifert-higgins@monsanto.com

James M. Nyangulu, PhD
Monsanto Company
1300 I Street, NW
Suite 450E
Washington DC 20005
(202) 383-2866 (Office)
(202) 304-6594 (Cell)

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 1/31/2017 9:03:05 PM
To: Groce, Stacey [groce.stacey@epa.gov]
Subject: FW: XtendiMax 24c Label
Attachments: 35008P1-31 Xtendimax_DT_Soybean Cotton GA.PDF; ATT00001.htm

Stacey -- I recently assigned this SLN to you and did not know we had in fact received the revised label. Disregard my note to you on this issue. Thanks.

-----Original Message-----
From: Gray, Thomas [mailto:Thomas.Gray@agr.georgia.gov]
Sent: Friday, January 20, 2017 9:28 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Andrews, Adrienne <Adrienne.Andrews@agr.georgia.gov>; Lowman, Alan <Alan.Lowman@agr.georgia.gov>
Subject: Fwd: XtendiMax 24c Label

Hi Tawanda!

Please see attached a revised 24c label for XtendiMax with VaporGrip that includes Georgia's information in the bottom right section of the label alongside of Monsanto's name.

I'll ask Adrienne Andrews in our office to send a copy through the documents record branch, as well.

Thanks!

Tommy Gray

Sent from my iPad

Begin forwarded message:

From: "BROWN, SHAZIA A [AG/1005]" <shazia.a.brown@monsanto.com<mailto:shazia.a.brown@monsanto.com>>
Date: January 19, 2017, 1:22:13 PM EST
To: "Gray, Thomas" <Thomas.Gray@agr.georgia.gov<mailto:Thomas.Gray@agr.georgia.gov>>
Cc: "SCHMIDT, THOMAS MARK [AG/1000]"
<thomas.mark.schmidt@monsanto.com<mailto:thomas.mark.schmidt@monsanto.com>>
Subject: RE: XtendiMax 24c Label

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, January 12, 2017 10:15 AM
To: Gray, Thomas
Subject: RE: Dicamba 24c Labels

Good morning Tommy,

Georgia's information would go across from Monsanto's as follows:

24(c) Registrant:
Georgia Department of Agriculture
19 Martin Luther King, Jr. Drive, Rm 429 Atlanta, GA 30334

Thanks,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov<mailto:Maignan.Tawanda@epa.gov>

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From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 5/24/2016 7:42:22 PM
To: Walsh, Michael [Walsh.Michael@epa.gov]; Petrella, Carlyn [Petrella.Carlyn@epa.gov]
Subject: FW: WA-140004 amend PHI from 3 days to 1 day for use of Entrust SC (EPA Reg. No. 62719-621) on blueberries
Attachments: Entrust SC-621 MSTR 19Oct15d W-Ed _black_.pdf

Mike and Carlyn,

In light of this most recent email, I believe the best path forward is for the label amendment to be addressed sense this is already a pending PRIA action. I was going to reach out to HED, however, I do not have a pending 24(c) for this. This seems to better suited to be addressed under the PRIA request and ensuring that the reduced PHI does not impact the tolerance. HED may be able to address this informally.

Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]
Sent: Tuesday, May 24, 2016 2:58 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Petrella, Carlyn <Petrella.Carlyn@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>
Subject: WA-140004 amend PHI from 3 days to 1 day for use of Entrust SC (EPA Reg. No. 62719-621) on blueberries

Afternoon,

Dr. Keith Dorschner, IR-4 (email: dorschner@AESOP.Rutgers.edu) sent me the following response today:

> *Here's a link to download a copy of the old spinosad/blueberry final report.*
> http://ir4.rutgers.edu/uploads/spinosad%20blueberry%20final%20report%2Epdf
>
> *max residues were around 0.2 ppm at one day PHI, so I'd say these data do support the shorter PHI at 0.4 ppm. I haven't run the numbers through any MRL calculator. however.*

Kristen Shears, Regulatory Specialist, Dow AgroSciences Office: 317.337.4791 kshears@dow.com provided the following response today: We submitted the attached label to the EPA on 12/7/15 as an R340 action. Expected timeline was four months however we have not yet received anything from the EPA in response to this action.

Based on this information, we plan to submit revised labeling for WA-140004 with a 1 day PHI.

Regards,
Steve

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Foss, Steve (AGR)
Sent: Monday, May 23, 2016 2:29 PM
To: Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>; petrella.carlyn@epa.gov; Walsh.michael@Epa.gov
Subject: Entrust SC (EPA Reg. No. 62719-621) - SLN request in WA to reduce PHI from 3 days to 1 day in bushberries (subgroup 13b)
Importance: High

Afternoon,

Dow AgroSciences LLC is requesting a Sec. 24(c) registration in Washington for Suppression of Spotted Wing Drosphila and Reduced PHI in Bushberries (Subgroup 13B).

Dow AgroSciences is proposing to reduce the PHI for bushberries from 3 days to 1 day. The reduction in the PHI has been requested from blueberry growers in order to combat Spotted Wing Drosphila.

Does the previously submitted magnitude of residue for blueberries (Spinosad: Magnitude of Residue on Blueberry: MRID 45311701) supported a 1 day PHI while maintaining the same established tolerance for bushberries of 0.40 ppm?

WA-140004 currently allows use of Entrust SC on blueberries only (not bushberries-Subgroup 13B) with a 3 day PHI.

Has Dow AgroSciences submitted the requested change in PHI from 3 days to 1 day as a section 3 amendment? This change did not happen on the last label revision https://www3.epa.gov/pesticides/chem_search/ppls/062719-00621-20160128.pdf.

Thank you for your assistance.

Regards,
Steve

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Shears, Kristen (K) [mailto:kshears@dow.com]
Sent: Monday, April 25, 2016 12:29 PM

To: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Subject: Dow AgroSciences Entrust SC Special Local Need Request

Steve:

I have attached a zip file of the pdfs for our Special Local Need submission that I referenced last week. One file is of significant size, hence the zip file. Please let me know if you have any issues with the files.

Best,

Kristen Shears Regulatory Specialist
Office: 317.337.4791 kshears@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 12/19/2016 10:49:27 PM
To: Andrea B. Conrath [conrath.andrea@epa.gov]
CC: O'Toole, Susan J - APHIS [Susan.J.O'Toole@aphis.usda.gov]
Subject: FW: Application for Continuation of Bt Cotton Section 18 targeting Pink Bollworm (14DA01)
Attachments: 2016 BtCotton S18 repeat application FINAL.pdf

Importance: High

Andrea –

As you are aware, we have received a request from USDA APHIS for the use of Bt cotton to control the pink bollworm in California. This is the fourth time USDA has requested this use pattern. Although, this is a repeat request, please note the current quarantine exemption does not expire until April 2017. Therefore, please process the submission to appropriate reviewers. I have copied the USDA contact, Susan, to acknowledge receipt and identify you as the reviewer. Please let me know if you have questions.

Thanks –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: O'Toole, Susan J - APHIS [mailto:Susan.J.O'Toole@aphis.usda.gov]
Sent: Wednesday, December 14, 2016 4:53 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Johnson, Marion <Johnson.Marion@epa.gov>; Conrath, Andrea B <Conrath.Andrea@epa.gov>; Defeo, Valerie F - APHIS <Valerie.DeFeo@aphis.usda.gov>; Don Parker <dparker@cotton.org>; Michael Weeks <michael.weeks@bayer.com>; Burton, Stephanie (SL) (SLBurton@dow.com) <SLBurton@dow.com>; Maguylo, Karen L - APHIS <Karen.L.Maguylo@aphis.usda.gov>; Akers, Patrick@CDFA <patrick.akers@cdfa.ca.gov>; Miller, Aaron B - APHIS <Aaron.B.Miller@aphis.usda.gov>; BURZIO, LUIS A [AG/1000] <luis.a.burzio@monsanto.com>; Palm, Mary E - APHIS <Mary.Palm@aphis.usda.gov>
Subject: Application for Continuation of Bt Cotton Section 18 targeting Pink Bollworm (14DA01)

Dear Ms. Maignan,

Attached please find the USDA APHIS PPQ request for a repeat Federal Quarantine Exemption permitting the use of 100% transgenic cotton in California to target the pink bollworm.

If you have any questions, please do not hesitate to contact me.

Best regards,

Susan O'Toole

National Pesticide Coordinator
Plant Protection and Quarantine
Animal and Plant Health Inspection Service
United States Department of Agriculture
4700 River Road Unit 160
Riverdale MD 20737
301.851.2243
sotoole@aphis.usda.gov

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 9/29/2016 7:56:44 PM
To: Foss, Steve (AGR) [SFoss@agr.wa.gov]
Subject: RE: NEW - WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of Ceanothus spe

Hi Steve,

Yes, that is the only process for submitting SLNs. An electronic process has not been established at this time.

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]
Sent: Thursday, September 29, 2016 3:19 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: NEW - WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of Ceanothus spe

Hello Tawanda,

Do we need to mail EPA a paper copy still?

Thank you,
Steve

From: Foss, Steve (AGR)
Sent: Wednesday, September 28, 2016 12:01 PM
To: 'Catherine H Daniels' <cdaniels@wsu.edu>; 'Lenora Jones' <lenora.jones@wsu.edu>; Tawanda Maignan (Maignan.Tawanda@epa.gov) <Maignan.Tawanda@epa.gov>
Cc: 'Alan Schreiber' <aschreib@centurytel.net>; 'Ben Miller' <ben.miller@agri.idaho.gov>; 'David Priebe' <dpriebe@oda.state.or.us>; 'Doug Walsh' <dwalsh@wsu.edu>; 'Joe Herrera' <jherrera@yakama.com>; 'John Inouye' <jinouye@cdpr.ca.gov>; Ronda Brown (RR) (RRBrown2@dow.com) <RRBrown2@dow.com>; Peterson, Vanelle (VF) <VFPeterson@dow.com>; Wesley S. Wasson (wassonw@helenachemical.com) <wassonw@helenachemical.com>
Subject: NEW - WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of Ceanothus species

Attached is Washington Special Local Need (SLN) registration number WA-160006 issued to Dow AgroSciences for use of Cleantraxx (EPA Reg. No. 62719-702) in conifers (such as Douglas-fir) and tree plantations to control broadleaf weeds (such as woodland groundsel and false dandelion) and seedlings of *Ceanothus* species.

Please contact me if you have any questions.

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 1/28/2019 8:33:12 PM
To: Tualagi Gaoteote [tualagi.gaoteote@epa.as.gov]
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Good afternoon Tualagi,

For proper processing all 24(c) packages must be submitted via a courier or standard mail.

Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>
Sent: Wednesday, January 09, 2019 9:43 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Tawanda,

I have a question, is it okay if I can scan the documents regarding the FIFRA Section 24 (c) SLN and email them to you? I will be mailing these documents once I get the final label.

Thank you,

On Fri, Oct 19, 2018 at 2:15 AM Maignan, Tawanda <Maignan.Tawanda@epa.gov> wrote:

> Hello Tualagi,
>
> Yes, you complete the **Determination by State Agency section** at the bottom of the form. Additionally, you would fill in the **For State Use Only** information in the top right corner of the form. Also, please ensure to provide a cover letter explaining why you all approved the 24(c) registration and what makes it a Special Local Need.
>
> Feel free to contact me if you have any further questions.

Thanks,

Tawanda

Tawanda Maignan

Emergency Response Team Leader

Minor Use & Emergency Response Branch

Registration Division | Office of Pesticide Programs

Office of Chemical Safety & Pollution Prevention

U.S. Environmental Protection Agency (7505P)

1200 Pennsylvania Avenue, NW | Washington, DC 20460

Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Tualagi Gaoteote [mailto:tualagi.gaoteote@epa.as.gov]
Sent: Thursday, October 18, 2018 7:39 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hello Tawanda,

This Tualagi Gaoteote from the American Samoa Environmental Protection Agency (AS-EPA). I'm the pesticide chief and I have a question. The EPA Form 8570-25 from Dow Agroscience Co. applying for 24 (c) SLN regarding the use and distribution of Milestone in American Samoa to eradicate Albizia. Do I fill in anything within the EPA Form 8570-25?

We have completed our review and was hoping that we can move forward with SLN issuance of the SLN.

Please let me know if anything.

Thanks,

On Wed, Jul 18, 2018 at 10:01 AM Maignan, Tawanda <Maignan.Tawanda@epa.gov> wrote:

Good afternoon Sonam,

As you are aware, 24(c)s are state/territory registrations. Therefore, the American Samoa Ag Department or other local government entity would need to review the package to ensure that it is in compliance with our regulations in the 40 CFR Part 162.

Once a decision is made to approve the request, then the areas designated for state use on the 8570-25 form would need to be filled in accordingly. The registrant would be contacted via letter of the decision and a request for the final label would be needed to include the SLN number (e.g., AS180001). A copy of the final SLN label, completed 8570-25 form and cover letter stating the SLN has been issued by the American Samoa, the local need (difference between the section 3 and 24(c)) and any supporting documentation must be sent within 10 days of issuance of the SLN to the following address via standard postal services:

U.S. Environmental Protection Agency

Document Processing Desk (SLN)

Office of Pesticide Program (7504P)

Room S4900, One Potomac Yard

2777 Crystal Drive

Arlington, VA 22202

I hope this helps. Feel free to contact me should you have any additional questions.

Regards –

Tawanda

Tawanda Maignan

Emergency Response Team Leader

Minor Use & Emergency Response Branch

Registration Division | Office of Pesticide Programs

Office of Chemical Safety & Pollution Prevention

U.S. Environmental Protection Agency (7505P)

1200 Pennsylvania Avenue, NW | Washington, DC 20460

Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Gill, Sonam
Sent: Wednesday, July 18, 2018 4:07 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

Thank you for sending the SLN along. I noticed American Samoa did not sign off on the form attached. At this point how should I advise their Pesticide staff on approving the use of this SLN? Is it just a matter of signing this form, or is there more to it?

Sonam

From: Montague, Kathryn V.
Sent: Wednesday, July 18, 2018 11:11 AM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Thank you, Sonam. I am copying our SLN team here in OPP-RD.

Best Regards,

Kay

From: Gill, Sonam
Sent: Tuesday, July 17, 2018 5:04 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>
Subject: FW: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

American Samoa informed me of this SLN submitted to them for Milestone (EPA Reg. No. 62719-519.) I wanted to pass the information along. Please let me know if you have any questions/comments.

Sonam

From: Tualagi Gaoteote [mailto:tualagi.gaoteote@epa.as.gov]
Sent: Wednesday, July 11, 2018 6:54 PM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Watanabe, Allison <Watanabe.Allison@epa.gov>; William Sili <william.sili@epa.as.gov>; Fa'amamata Meredith <faamamata.meredith@epa.as.gov>
Subject: Fwd: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Sonam,

I'm forwarding the information I got from Mr. Bauer in regards to Mr. Baker's request for applying for a SLN (Section 24c) for the Milestone.

Please let me know if anything.

Thanks,

---------- Forwarded message ----------
From: **Bauer, Elaine** <EKBauer@dow.com>
Date: Wed, Jun 27, 2018 at 9:28 AM
Subject: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa
To: "tualagi.gaoteote@epa.as.gov" <tualagi.gaoteote@epa.as.gov>
Cc: "RODRIGUEZ, ANA CRISTINA" <ana-cristina.rodriguez@dupont.com>, "Bret, Brian (B)" <blbret@dow.com>, "Jones-Jefferson, Tami (T)" <tjjonesjefferson@dow.com>, "Galvin, Cathy (CL)" <CLGalvin@dow.com>

Dear Taulagi Gaoteote:

On June 11, 2018, I mailed to the American Samoa EPA a submission for a Section 24(c) label to fulfill a special local need for **Milestone for Control of Albizia in American Samoa**. We submitted the package in response to a request from Dr. David Bakke, US Forest Service, Pacific Southwest Region.

I'm writing to see if you have any questions or need anything more from Dow AgroSciences regarding the submission or the label.

Also, I want to provide you with the electronic copies of the documents that we mailed to you. See attached. The documents include:

1. Transmittal letter with justification

2. EPA form 8570-25 Application for/Notification of State Registration of a Pesticide to Meet a Special Local Need

3. Proposed Section 24(c) label for Milestone herbicide entitled "For Control of Albizia and Other Woody Species in Natural Areas" (Dow AgroSciences internal code R879-078)

4. Field efficacy data from Dr. James Leary, University of Hawaii at Manoa, Field Efficacy of Milestone (EPA reg. no. 62719-519) with the active ingredient aminopyralid as a metered, undiluted injection applied to high-priority invasive arboreal weed targets in the Pacific Basin. 6 pp.

5. Letter of support from USDA Forest Service, Pacific Southwest Region: Sherry Hazelhurst, Director of State and Private Forestry and Dr. David Bakke, Invasive Plants Program Manager and Regional Pesticide-use Specialist

Feel free to write or call me, whether it is with questions or with your approval of the SLN and 24(c) label. And please let me know if you need anything more. Many thanks.

Best regards,

Elaine

Elaine Bauer

Crop Protection Regulatory Specialist, US Regulatory Affairs

Corteva Agriscience™, Agriculture Division of DowDuPont™

Dow AgroSciences

Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268

Contact: 317-337-4073 or ekbauer@dow.com

--

Tualagi Gaoteote

Environmental Specialist II

AS-EPA

P.O.BOX PPA

Utulei Office Building

Pago Pago, AS, 96799

tualagi.gaoteote@epa.as.gov

--

Tualagi Gaoteote

Environmental Specialist III

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Utulei Office Building

Pago Pago, AS, 96799

tualagi.gaoteote@epa.as.gov

--

Tualagi Gaoteote
Environmental Specialist III
AS-EPA
P.O.BOX PPA
Utulei Office Building
Pago Pago, AS, 96799
tualagi.gaoteote@epa.as.gov

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 8/8/2016 4:21:15 PM
To: Kish, Tony [Kish.Tony@epa.gov]; Johnson, Hope [Johnson.Hope@epa.gov]
Subject: RE: Tebuconazole: Possible 24(c)

Hope – No action is needed at this time. Unless, I get push back, then I may need you to chime in. ☺

From: Kish, Tony
Sent: Monday, August 08, 2016 12:19 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Tebuconazole: Possible 24(c)

Hope- looks like this is yours for comment.

From: Maignan, Tawanda
Sent: Monday, August 08, 2016 11:21 AM
To: Kish, Tony <Kish.Tony@epa.gov>
Subject: FW: Tebuconazole: Possible 24(c)

Hi Tony,

Not sure if you are the PM for tebuconazole, but thought I would forward this to your attention as a FYI. Please feel free to forward elsewhere if you are not the correct PM.

From: Maignan, Tawanda
Sent: Monday, August 08, 2016 11:17 AM
To: 'Jessica Fernandez' <jessica.fernandez@bayer.com>
Cc: charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; Marion Johnson (Johnson.Marion@epa.gov) <Johnson.Marion@epa.gov>
Subject: RE: Tebuconazole: Possible 24(c)

Good morning Jessica,

Generally speaking, I would not be in support of allowing this use pattern under a section 24(c) special local need registration. Although, an import tolerance is established for orange, there are no U.S. registrations. Moreover, I am not sure if the current tolerance would support the proposed use pattern for direct use within the U.S. This would be an expansion of the Section 3 label that may raise human or environmental risk concerns and the only way to confirm no additional exposure or risk would occur would require a risk assessment. In these type of cases, it is recommended the registrant seek a Section 3 registration amendment under PRIA. Let me know if you have any additional questions.

Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader

Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Monday, August 08, 2016 7:30 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Madden, Barbara <Madden.Barbara@epa.gov>; charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: Tebuconazole: Possible 24(c)

Hi Tawanda – I just wanted to provide additional details to my voice message from last Thursday:

Bayer is evaluating the possibility of pursuing a 24(c) registration in Florida for one of our tebuconazole formulations. The proposed use would be on oranges, for control of Post Bloom Fruit Drop. Based on grower feedback and our communication with Charlie Clark, of FDACS, we believe that this use fits within the scope of Sec. 24(c), in that the lack of tools currently available to growers for control of this disease, support it as a special local need in Florida. We are seeking clarity however, in regards to the tolerance requirements, as stipulated under Sec. 24(c). In the case of tebuconazole, there is an existing import tolerance established on oranges. The language stated under 24(c) does not seem to distinguish between domestic and import tolerances and therefore we are seeking clarity as to whether there are any policies that would preclude the use of an import tolerance in support of a registration under 24(c).

Below are the MRID numbers for the residue data currently on file with the Agency in support of the orange tolerance for tebuconazole:

- 48961901, 48961902, 48961903 (two processing studies and one post-harvest study), and 49073101 (citrus crop field study)

There is a use registered in Brazil currently for their Nativo (10% trifloxystrobin + 20% tebuconazole) on citrus. The formulations which we are considering for the 24(c), are 264-849 (trifloxystrobin 22.63% + tebuconazole 22.63%), or 264-1091(fluopyram 17.6% + tebuconazole 17.6%). Both, Trifloxystrobin and Fluopyram are currently registered in the US for use on citrus. We would propose a use pattern that does not exceed what is already registered for trifloxystrobin or fluopyram , and a rate of tebuconazole equivalent to what is registered currently in Brazil.

Thanks in advance for any guidance you can provide and please let me know if you need additional information.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709
Tel: +1 919 5492631

Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

From: Jessica Fernandez
Sent: Friday, July 22, 2016 8:58 AM
To: charlie.clark@freshfromflorida.com
Cc: Christine Villegas
Subject: Tebuconazole: Possible 24(c)

Hi Charlie,

Christine and I were wondering If it would be possible to set up a call with you, for a short discussion on a potential 24(c) request for control of Citrus Anthracnose (Post Bloom Fruit Drop). We understand from grower feedback, that there is a true need for additional products that will provide control of this disease in FL. We have consulted with our colleagues in Brazil, where the disease is also prevalent, and we have learned that tebuconazole containing products are among the strongest tools currently available in Brazil for Post Bloom Fruit Drop. We would like to explore the possibility of pursuing a 24(c) for one of our tebuconazole containing formulations in Florida. The two formulations that we are considering for this submission are:

- Luna Experience (264-1091) (Fluopyram + Tebuconazole)
- Absolute 500 SC (264-849) (Trifloxystrobin + Tebuconazole)

All active ingredients have existing tolerances on oranges published in the CFR, however for tebuconazole, there are no US labels with citrus listed at this time, since the tolerance was established as an import tolerance. Current tolerances for tebuconazole are: 1.0 ppm for Orange and 10 ppm for Orange oil.

If you have a few minutes to discuss and can let us know of your availability, we would greatly appreciate it. Thanks in advance for your time and help… we are looking forward to talking to you.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709
Tel: +1 919 5492631
Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 8/8/2016 3:16:47 PM
To: Jessica Fernandez [jessica.fernandez@bayer.com]
CC: charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) [Adam.Rose@freshfromflorida.com]; Christine Villegas [christine.villegas@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]; Marion Johnson (Johnson.Marion@epa.gov) [Johnson.Marion@epa.gov]
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Regards,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Monday, August 08, 2016 7:30 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Madden, Barbara <Madden.Barbara@epa.gov>; charlie.clark@freshfromflorida.com; Rose, Adam (Adam.Rose@freshfromflorida.com) <Adam.Rose@freshfromflorida.com>; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
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Thanks in advance for any guidance you can provide and please let me know if you need additional information.

Best regards,

Jessica Fernandez
Registrations

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Crop Science Division
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2 T.W. Alexander Drive
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Tel: +1 919 5492631
Mobile: Personal Matters / Ex. 6
E-mail: jessica.fernandez@bayer.com
Web: http://www.bayer.com

From: Jessica Fernandez
Sent: Friday, July 22, 2016 8:58 AM
To: charlie.clark@freshfromflorida.com
Cc: Christine Villegas
Subject: Tebuconazole: Possible 24(c)

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If you have a few minutes to discuss and can let us know of your availability, we would greatly appreciate it. Thanks in advance for your time and help… we are looking forward to talking to you.

Best regards,

Jessica Fernandez
Registrations

Bayer: Science For A Better Life

Crop Science Division
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2 T.W. Alexander Drive
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Tel: +1 919 5492631
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Web: http://www.bayer.com

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 5/25/2017 6:20:40 PM
To: Jessica Fernandez [jessica.fernandez@bayer.com]; Johnson, Hope [Johnson.Hope@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]; Giles-Parker, Cynthia [Giles-Parker.Cynthia@epa.gov]
CC: John.Inouye@cdpr.ca.gov; Christine Villegas [christine.villegas@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Good afternoon Jessica –

Based on what you have shared, it would be challenging to make a decision on whether or not the current tolerance would support the 24(c) without a clear understanding of the use pattern being sought. Further, it would be helpful for Bayer to review current data to support the use and develop a rationale on why the tolerance would not be impacted. Generally, 24(c)s are meant to be minor modifications to Section 3 registrations which do not require a risk assessment from EPA because otherwise the amendment would need to be submitted under PRIA for a fee.

As for a section 18, my preliminary thoughts is that this does not meet the criteria. However, I recommend reviewing the following emergency exemption training resource link for further guidance on section 18s: https://www3.epa.gov/pesticides/regulating/section18_training/.
Last but not least, feel free to contact me directly should have any additional questions.

Regards –
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 1:48 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Giles-Parker, Cynthia <Giles-Parker.Cynthia@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Thank you Hope.

Dear Marion and Tawanda,

Hope has provided feedback in relation to the existing tolerance supporting the added use of mandarin to our Section 3 label (Scala Fungicide 264-788). Since the need for control of *Alternaria citri* has been communicated to us by the

California growers (through Citrus Mutual), and it appears to be a need local to California, we would like to know if the existing residue data would support and in-field use pattern on a 24(c) in California. There currently is a post-harvest use registered to Janssen Pharmaceutica as a Sec. 3, on citrus group 10-10. We discussed with Janssen and would like to reduce the potential for resistance that could result from the use of pyrimethanil in –field and post-harvest. Therefore a Special local need would be more appropriate to keeping the use local to California and avoiding in-field use in additional states where growers have not expressed a need at this time.

Please let us know of your view in regards to existing tolerances supporting a 24(c) for in-field use. Additional details are provided in bullet points in our original email to John Inouye below. Thanks in advance for your help.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Johnson, Hope [mailto:Johnson.Hope@epa.gov]
Sent: Thursday, May 25, 2017 1:16 PM
To: Jessica Fernandez; Maignan, Tawanda; Johnson, Marion; Giles-Parker, Cynthia
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas; BCSReg_Archive
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Jessica-

Marion and Tawanda are the contacts for 24c and Section 18s.

Pyrimethanil has tolerances established on citrus crop group 10-10. This includes mandarin.
https://www.ecfr.gov/cgi-bin/text-idx?SID=a83cd470acd0562abe3deade66f50852&mc=true&node=pt40.26.180&rgn=div5#se40.26.180_1518
See 40 CFR 180.41 for crop group listings.

If it isn't on the Section 3 label, it could be amended to include this designation. However, PRIA fees could apply if only certain commodities are currently listed on pyrimethanil labels.

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Jessica Fernandez [mailto:jessica.fernandez@bayer.com]
Sent: Thursday, May 25, 2017 11:41 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>
Cc: John.Inouye@cdpr.ca.gov; Christine Villegas <christine.villegas@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: FW: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi Hope,

We have received a request from Citrus Mutual and other stakeholders for use of Pyrimethanil (Scala Brand Fungicide (264-788)) on oranges in the field. We've reached out to John Inouye, with CDPR, since the need is specific to CA, to inquire about the feasibility of pursuing a 24(c) for the use. One of our questions is whether the existing tolerance for pyrimethanil on Citrus crop group 10-10, would support the proposed 24(c). John has suggested that we consult with you to gain further clarity. There are a few bullet points listed in our original email to John below, which summarize the tolerance situation relative to pyrimethanil on citrus and we were wondering if you could take a look and provide us your feedback. Please let me know if you need additional information, or if any of the information below is not clear. Thank you in advance.

Freundliche Grüße / Best regards,

Jessica Fernandez
Registration Manager

Bayer: Science For A Better Life

Bayer U.S. LLC
Crop Science, Crop Science
Registrations
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel: +1 919 549 2631
Mobile: +1 919 475 1100
E-mail: jessica.fernandez@bayer.com

From: Inouye, John@CDPR [mailto:John.Inouye@cdpr.ca.gov]
Sent: Wednesday, May 24, 2017 2:01 PM
To: Christine Villegas
Subject: RE: Question 24(c) or possible Sec 18 - Scala on Citrus

Christie-

I believe the tolerance should support use on mandarins, but I recommend you contact the Federal Product Manager for Scala for confirmation. Why not amend the label to include use on mandarins?

Sincerely,

John

From: Christine Villegas [mailto:christine.villegas@bayer.com]
Sent: Wednesday, May 24, 2017 10:33 AM
To: Inouye, John@CDPR
Subject: Question 24(c) or possible Sec 18 - Scala on Citrus

Hi John,

Bayer has been approached by CA Citrus Mutual about a possible 24(c) for Scala Brand SC Fungicide, EPA Reg. No. 264-788 (active ingredient: Pyrimethanil), on citrus for control of *Alternaria citri.* Would the existing tolerance, which is based on in-field and post-harvest residue data on lemon, and on post-harvest residue data on the other citrus fruits, support a 24(c) request for an in-field use of Scala on citrus in CA? If not, is a Sec 18 a possibility?

- The last three season, have seen CA fruit crop loses in mandarin varieties anywhere from 10-90% due to the primary damage caused by the pathogen.
- The use has been requested by the Citrus Mutual and other stakeholders and they have indicated they will prepare letters of support to include with the submission.
- There is a current tolerance in place for Pyrimethanil on Citrus Fruit Group (crop group 10-10) of 10 ppm.
- Scala is currently EPA-registered as a foliar, in field use on lemon, but not on any other citrus fruits.
- Penbotec 400 SC, EPA Reg. No. 43813-32 (Pyrimethanil 37.14%; registered to Janssen Pharmaceutical) is labeled for post-harvest use on the entire citrus fruit group 10-10

Thanks!
Christie

Best regards,

Christie Villegas
State Registrations, Crop Science

Science For A Better Life

Bayer U.S.
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Tel (office): +1 919.549.5355
Tel (cell): +1 919.475.6959
Fax: +1 919.549.2905

christine.villegas@bayer.com

Web: http://www.bayer.com

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Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 6/20/2016 8:53:39 PM
To: Zavala, Miguel A. [Zavala.Miguel@epa.gov]
Subject: FW: Syngenta 24(c) Cancellation Request - PA-150003 - Heritage Fungicide
Attachments: PAHeritageBasilSLNCancellationLtr_6-20-16.pdf

Importance: High

Miguel – Attached is voluntary cancellation request for a SLN. Please let me know if you have questions.

Thanks,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Lake, John [mailto:jlake@pa.gov]
Sent: Monday, June 20, 2016 4:29 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: 'pat.dinnen@syngenta.com' <pat.dinnen@syngenta.com>
Subject: FW: Syngenta 24(c) Cancellation Request - PA-150003 - Heritage Fungicide
Importance: High

Tawanda

Please note that the registrant has requested and the Commonwealth concurs with the cancellation of SLN PA-150003.

Thank you

John

John R. Lake | PESTICIDE REGISTRATION
Pennsylvania Department of Agriculture
Bureau of Plant Industry | Health & Safety Section
2301 North Cameron Street | Harrisburg, PA 17110
Phone: 717.772.5211| Fax: 717.783.3275
www.agriculture.state.pa.us | e-mail jlake@pa.gov

From: Dinnen Pat USGR [mailto:pat.dinnen@syngenta.com]
Sent: Monday, June 20, 2016 3:51 PM
To: Lake, John
Subject: Syngenta 24(c) Cancellation Request - PA-150003 - Heritage Fungicide

Hello John,

Please see the attached letter requesting cancellation of EPA SLN No. PA-150003. This use has been added to the Section 3 label.

If you have any questions, please let me know.

Thank you,
Pat

Regulatory Manager
State Registration/State Affairs
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, NC 27419-8300
336-632-2494
pat.dinnen@syngenta.com

This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited.

Message

From: Maignan, Tawanda [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=55FEB19C04B64D36B629242FD3FA4912-TAWANDA MAIGNAN]
Sent: 10/19/2018 1:15:08 PM
To: Tualagi Gaoteote [tualagi.gaoteote@epa.as.gov]
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hello Tualagi,

Yes, you complete the **Determination by State Agency section** at the bottom of the form. Additionally, you would fill in the **For State Use Only** information in the top right corner of the form. Also, please ensure to provide a cover letter explaining why you all approved the 24(c) registration and what makes it a Special Local Need.

Feel free to contact me if you have any further questions.

Thanks,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Minor Use & Emergency Response Branch
Registration Division | Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Tualagi Gaoteote [mailto:tualagi.gaoteote@epa.as.gov]
Sent: Thursday, October 18, 2018 7:39 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hello Tawanda,

This Tualagi Gaoteote from the American Samoa Environmental Protection Agency (AS-EPA). I'm the pesticide chief and I have a question. The EPA Form 8570-25 from Dow Agroscience Co. applying for 24 (c) SLN regarding the use and distribution of Milestone in American Samoa to eradicate Albizia. Do I fill in anything within the EPA Form 8570-25?

We have completed our review and was hoping that we can move forward with SLN issuance of the SLN.

Please let me know if anything.

Thanks,

On Wed, Jul 18, 2018 at 10:01 AM Maignan, Tawanda <Maignan.Tawanda@epa.gov> wrote:

> Good afternoon Sonam,

As you are aware, 24(c)s are state/territory registrations. Therefore, the American Samoa Ag Department or other local government entity would need to review the package to ensure that it is in compliance with our regulations in the 40 CFR Part 162.

Once a decision is made to approve the request, then the areas designated for state use on the 8570-25 form would need to be filled in accordingly. The registrant would be contacted via letter of the decision and a request for the final label would be needed to include the SLN number (e.g., AS180001). A copy of the final SLN label, completed 8570-25 form and cover letter stating the SLN has been issued by the American Samoa, the local need (difference between the section 3 and 24(c)) and any supporting documentation must be sent within 10 days of issuance of the SLN to the following address via standard postal services:

U.S. Environmental Protection Agency

Document Processing Desk (SLN)

Office of Pesticide Program (7504P)

Room S4900, One Potomac Yard

2777 Crystal Drive

Arlington, VA 22202

I hope this helps. Feel free to contact me should you have any additional questions.

Regards –

Tawanda

Tawanda Maignan

Emergency Response Team Leader

Minor Use & Emergency Response Branch

Registration Division | Office of Pesticide Programs

Office of Chemical Safety & Pollution Prevention

U.S. Environmental Protection Agency (7505P)

1200 Pennsylvania Avenue, NW | Washington, DC 20460

Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov

From: Gill, Sonam
Sent: Wednesday, July 18, 2018 4:07 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

Thank you for sending the SLN along. I noticed American Samoa did not sign off on the form attached. At this point how should I advise their Pesticide staff on approving the use of this SLN? Is it just a matter of signing this form, or is there more to it?

Sonam

From: Montague, Kathryn V.
Sent: Wednesday, July 18, 2018 11:11 AM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>
Subject: RE: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Thank you, Sonam. I am copying our SLN team here in OPP-RD.

Best Regards,

Kay

From: Gill, Sonam
Sent: Tuesday, July 17, 2018 5:04 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Tualagi Gaoteote <tualagi.gaoteote@epa.as.gov>
Subject: FW: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Kathryn,

American Samoa informed me of this SLN submitted to them for Milestone (EPA Reg. No. 62719-519.) I wanted to pass the information along. Please let me know if you have any questions/comments.

Sonam

From: Tualagi Gaoteote [mailto:tualagi.gaoteote@epa.as.gov]
Sent: Wednesday, July 11, 2018 6:54 PM
To: Gill, Sonam <Gill.Sonam@epa.gov>
Cc: Watanabe, Allison <Watanabe.Allison@epa.gov>; William Sili <william.sili@epa.as.gov>; Fa'amamata Meredith <faamamata.meredith@epa.as.gov>
Subject: Fwd: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa

Hi Sonam,

I'm forwarding the information I got from Mr. Bauer in regards to Mr. Baker's request for applying for a SLN (Section 24c) for the Milestone.

Please let me know if anything.

Thanks,

---------- Forwarded message ----------
From: **Bauer, Elaine** <EKBauer@dow.com>
Date: Wed, Jun 27, 2018 at 9:28 AM

Subject: 24(c) Label for SLN for Milestone to Control Albizia in American Samoa
To: "tualagi.gaoteote@epa.as.gov" <tualagi.gaoteote@epa.as.gov>
Cc: "RODRIGUEZ, ANA CRISTINA" <ana-cristina.rodriguez@dupont.com>, "Bret, Brian (B)" <blbret@dow.com>, "Jones-Jefferson, Tami (T)" <tjjonesjefferson@dow.com>, "Galvin, Cathy (CL)" <CLGalvin@dow.com>

Dear Taulagi Gaoteote:

On June 11, 2018, I mailed to the American Samoa EPA a submission for a Section 24(c) label to fulfill a special local need for **Milestone for Control of Albizia in American Samoa**. We submitted the package in response to a request from Dr. David Bakke, US Forest Service, Pacific Southwest Region.

I'm writing to see if you have any questions or need anything more from Dow AgroSciences regarding the submission or the label.

Also, I want to provide you with the electronic copies of the documents that we mailed to you. See attached. The documents include:

1. Transmittal letter with justification

2. EPA form 8570-25 Application for/Notification of State Registration of a Pesticide to Meet a Special Local Need

3. Proposed Section 24(c) label for Milestone herbicide entitled "For Control of Albizia and Other Woody Species in Natural Areas" (Dow AgroSciences internal code R879-078)

4. Field efficacy data from Dr. James Leary, University of Hawaii at Manoa, Field Efficacy of Milestone (EPA reg. no. 62719-519) with the active ingredient aminopyralid as a metered, undiluted injection applied to high-priority invasive arboreal weed targets in the Pacific Basin. 6 pp.

5. Letter of support from USDA Forest Service, Pacific Southwest Region: Sherry Hazelhurst, Director of State and Private Forestry and Dr. David Bakke, Invasive Plants Program Manager and Regional Pesticide-use Specialist

Feel free to write or call me, whether it is with questions or with your approval of the SLN and 24(c) label. And please let me know if you need anything more. Many thanks.

Best regards,

Elaine

Elaine Bauer

Crop Protection Regulatory Specialist, US Regulatory Affairs

Corteva Agriscience™, Agriculture Division of DowDuPont™

Dow AgroSciences

Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268

Contact: 317-337-4073 or ekbauer@dow.com

--

Tualagi Gaoteote

Environmental Specialist II

AS-EPA

P.O.BOX PPA

Utulei Office Building

Pago Pago, AS, 96799

tualagi.gaoteote@epa.as.gov

--

Tualagi Gaoteote
Environmental Specialist III
AS-EPA
P.O.BOX PPA
Utulei Office Building
Pago Pago, AS, 96799
tualagi.gaoteote@epa.as.gov

Message

From: Scheltema, Christina [Scheltema.Christina@epa.gov]
Sent: 2/4/2016 10:51:16 PM
To: Hughes, Jenn (JL) [JLHughes@dow.com]
CC: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: sulfentrazone registration review - required label amendments
Attachments: Feb 3 sulfentrazone mitigation letter.pdf; Dec 14 2015 sulfentrazone final ID.pdf; Sulfentrazone ID Notice of Availability.pdf; Dow Sulfentrazone Product.doc

Hi Jenn,

EPA recently completed an interim registration review decision for sulfentrazone requiring certain labeling to ensure that sulfentrazone products continue to meet current health and safety standards. Therefore, Dow is required to amend its sulfentrazone product label to implement the registration review decision. Please see attached files for details. Label amendments must be submitted to me by April 5, 2016. Because this is an Agency initiated action, there is no PRIA fee.

Best regards,

Christina

Christina Scheltema
Pesticide Re-evaluation Division
Office of Pesticide Programs
office phone: (703)308-2201

Message

From: Scheltema, Christina [Scheltema.Christina@epa.gov]
Sent: 2/4/2016 10:33:11 PM
To: Annette Bloomberg [annette.bloomberg@bayer.com]
CC: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: sulfentrazone registration review - required label amendments
Attachments: Feb 3 sulfentrazone mitigation letter.pdf; Dec 14 2015 sulfentrazone final ID.pdf; Sulfentrazone ID Notice of Availability.pdf; Bayer Sulfentrazone Products - from DuPont.doc

Importance: High

Dear Annette,

EPA recently completed an interim registration review decision for sulfentrazone requiring certain labeling to ensure that sulfentrazone products continue to meet current health and safety standards. Therefore, Bayer is required to amend its sulfentrazone product labels to implement the registration review decision. Please see attached files for details. Label amendments must be submitted to me by April 5, 2016. Because this is an Agency initiated action, there is no PRIA fee.

Best regards,

Christina

Christina Scheltema
Pesticide Re-evaluation Division
Office of Pesticide Programs
office phone: (703)308-2201

Message

From: Richard.J.Ambrose@dupont.com [Richard.J.Ambrose@dupont.com]
Sent: 3/31/2016 7:01:42 PM
To: Scheltema, Christina [Scheltema.Christina@epa.gov]
CC: Montague, Kathryn V. [Montague.Kathryn@epa.gov]; USREG2@nanotes1.email.dupont.com; Christine.M.Klinefelter@dupont.com
Subject: Label Amendment in Response to Requested Label Changes From the January 2016 Interim Registration Review Decision for Sulfentrazone Containing Products: DuPont™ Canopy XL® Herbicide (EPA Reg. No. 352-589)
Attachments: 000352-00589.20160330.D-2002 032816.CanopyXL.pdf; HighlightedchangesCANOPY XL D-2002 0328r.pdf; REf Letter EPAFeb 3 sulfentrazone mitigation letter.pdf

Hi Christina,

As instructed in the Agency's letter dated February 3, 2016, entitled: "Label Changes Necessary for Sulfentrazone in Accordance with EPA's January 2016 Interim Registration Review Decision" (attached for reference), DuPont is sending an electronic copy of the proposed amended product label for DuPont™ Canopy XL® herbicide via e-mail for your reference. In addition, we are sending a clean electronic copy to review. See attachments…

Also as instructed, on March 30, 2016 E.I. DuPont de Nemours and Company (DuPont) submitted a label amendment for Environmental Protection Agency (EPA) Registration Number 352-589. This new proposed labeling will replace the currently EPA accepted labeling SL-888 030703 12-19-03. This amendment is in response label changes deemed necessary in accordance with EPA's January 2016 *Interim Registration Review Decision for Sulfentrazone* (Docket EPA-HQ-OPP-2009-0624, Case # 7231). As part of the interim decision, EPA determined that changes are necessary to ensure that sulfentrazone continues to meet the safety standards of the Federal Insecticide Fungicide Act. This amendment was delivered to the Agency today by courier.

This amendment includes changes such as:

- Necessary edits from the above Interim Registration Review Decision
- Moved from a double column format to a single column format
- An updated DuPont address
- Updated tank mix partner products brand names
- Addition of a "Use Restriction", "Sensitive Areas", and "Drift Control Additives" sections
- Updated "Weed Resistance", "Integrated Pest Management", "Storage and Disposal", and "Limitation of Warranty and Liability" sections

Enclosed in the paper submission is the following Administrative materials, which included a cover letter:

Administrative Volume:	
Attached	**Materials Attached**
1	A completed "Application for Pesticide ", EPA Form 8570-1
2	A completed "Certification with Respect to Label Integrity" form
3	As Reference: February 3, 2016 letter from EPA's Kelly Sherman, Chief, Risk Management and Implementation, Pesticide Re-evaluation Division requesting this label amendment be submitted to Christina Scheltema, Pesticide Re-evaluation Division
4	One (1) copy of the currently accepted Section 3 labeling identified as SL-888 030703 12-19-03
5	One (1) copy of the proposed Section 3 labeling with changes highlighted verses the currently accepted labeling
6	Three (3) copies of the proposed Section labeling D-2002 032816
7	An electronic version of the proposed labeling on CD-ROM, file name: 000352-00589.20160330.D-2002 032816.CanopyXL.pdf

I will send a separate email similar to this one for our other active sulfentrazone containing product.
My contact information is below if you have any questions.

Kind Regards,
Rick

Richard J. Ambrose
U.S. Product Registration Manager
DuPont Crop Protection
Stine Haskell Research Center S300/416
1090 Elkton Road, P.O. Box 30
Newark, Delaware 19714
richard.j.ambrose@usa.dupont.com
Office: (302) 366-5185
Mobile: (302) 528-3764

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

Message

From: Richard.J.Ambrose@dupont.com [Richard.J.Ambrose@dupont.com]
Sent: 3/31/2016 8:53:30 PM
To: Scheltema, Christina [Scheltema.Christina@epa.gov]
CC: Montague, Kathryn V. [Montague.Kathryn@epa.gov]; USREG2@nanotes1.email.dupont.com; Christine.M.Klinefelter@dupont.com
Subject: Label Amendment in Response to Requested Label Changes From the January 2016 Interim Registration Review Decision for Sulfentrazone Containing Products: DuPont™ Authority® Herbicide, EPA Reg. No. 352-590
Attachments: REf Letter EPAFeb 3 sulfentrazone mitigation letter.pdf; Highlighted ChangesAUTHORITY D-2001 032816r.pdf; 000352-00590.20160330.D-2001 032816.CoverAuthority.pdf.pdf

Hi Christina,

As instructed in the Agency's letter dated February 3, 2016, entitled: "Label Changes Necessary for Sulfentrazone in Accordance with EPA's January 2016 Interim Registration Review Decision" (attached for reference), DuPont is sending an electronic copy of the proposed amended product label for DuPont™ Authority® herbicide (Primary Brand: DuPont™ Cover™ Herbicide) via e-mail for your reference with the changes highlighted. In addition, we are sending a clean electronic copy to review. See attachments…

Also as instructed, on March 30, 2016 E.I. DuPont de Nemours and Company (DuPont) submitted a label amendment for Environmental Protection Agency (EPA) Registration Number 352-590. This new proposed labeling will replace the currently EPA accepted labeling identified as SL-797 101501 05-21-02. This amendment is in response to label changes deemed necessary in accordance with EPA's January 2016 *Interim Registration Review Decision for Sulfentrazone* (Docket EPA-HQ-OPP-2009-0624, Case # 7231). As part of the interim decision, EPA determined that changes are necessary to ensure that sulfentrazone continues to meet the safety standards of the Federal Insecticide Fungicide Act. This amendment should be delivered to the Agency tomorrow by courier.

This amendment includes changes such as:

- Necessary edits from the above Interim Registration Review Decision
- Moved from a double column format to a single column format
- An updated DuPont address
- Updated tank mix partner products brand names
- Addition of a "Use Restriction", "Sensitive Areas", and "Drift Control Additives" sections
- Updated "Weed Resistance", "Integrated Pest Management", "Storage and Disposal", and "Limitation of Warranty and Liability" sections

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Attached	**Materials Attached**
1	A completed "Application for Pesticide ", EPA Form 8570-1
2	A completed "Certification with Respect to Label Integrity" form
3	As Reference: February 3, 2016 letter from EPA's Kelly Sherman, Chief, Risk Management and Implementation, Pesticide Re-evaluation Division requesting this label amendment be submitted to Christina Scheltema, Pesticide Re-evaluation Division
4	One (1) copy of the currently accepted Section 3 labeling identified as SL-797 101501 05-21-02
5	One (1) copy of the proposed Section 3 labeling with changes highlighted verses the currently accepted labeling
6	Three (3) copies of the proposed Section labeling D-2001 032816

7	An electronic version of the proposed labeling on CD-ROM, file name: 000352-00590.20160330.D-2001 032816.CoverAuthority.pdf

My contact information is below if you have any questions.

Kind Regards,
Rick

Richard J. Ambrose
U.S. Product Registration Manager
DuPont Crop Protection
Stine Haskell Research Center S300/416
1090 Elkton Road, P.O. Box 30
Newark, Delaware 19714
richard.j.ambrose@usa.dupont.com
Office: (302) 366-5185
Mobile: (302) 528-3764

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Message

From: Vaughn, Louis [Vaughn.Louis@epa.gov]
Sent: 8/15/2016 8:37:46 PM
To: Vinjamuri, Santa [Vinjamuri.Santa@epa.gov]; Adams, Teretha [Adams.Teretha@epa.gov]; Dillard, Sylvia [Dillard.Sylvia@epa.gov]
CC: Montague, Kathryn V. [Montague.Kathryn@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]
Subject: FW: Transfer 62719 RAD 10163
Attachments: L_62719_RAD_10163_08_15_2016.pdf

For your records and jackets.

Lou

From: Vaughn, Louis
Sent: Monday, August 15, 2016 3:37 PM
To: Hobson, Eric (E) <EAHOBSON@dow.com>; Houtman, Diane (B) <DBGRESS@dow.com>; Kyla Smith <KSSmith@GOWANCO.com>; 'kracke@dow.com' <kracke@dow.com>
Subject: Transfer 62719 RAD 10163

Attached, is the Registration and Data Transfer from **Dow AgroSciences LLC (62719) to Gowan Co. (10163).** Due to a sale of the product line, you transferred 6 products, 16 SLNs and 40 Pages of Studies (No Exclusive Use).

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
TREFLAN E.C. WEED AND GRASS PREVENTER	**62719-97**	**10163-359**
TREFLAN 5G	**62719-98**	**10163-360**
TRIFLURALIN TECHNICAL	**62719-99**	**10163-361**
TREFLAN TR-10	**62719-131**	**10163-362**
TREFLAN H.F.P.	**62719-250**	**10163-363**
SHOWCASE	**62719-516**	**10163-364**

SLN Number	Old Registrant/	New Registrant/
AZ110004	**62719**	**10163**
CA010021	**62719**	**10163**
CA110012	**62719**	**10163**
CA870029	**62719**	**10163**
KS990005	**62719**	**10163**
KS990006	**62719**	**10163**
MN100004	**62719**	**10163**
NM910001	**62719**	**10163**
NM970002	**62719**	**10163**
NV900001	**62719**	**10163**
OR900019	**62719**	**10163**
TX930003	**62719**	**10163**
TX960012	**62719**	**10163**
UT870002	**62719**	**10163**

UT900001	**62719**	**10163**
WA900016	**62719**	**10163**

Best regards.

For Change of Address or Agent:
http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-how-report-changes-company-name-or-address

For Product Transfers, Data Transfers or Company Numbers Transfers:
http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-16-transfer-product-registrations-and

For Other Information: http://www2.epa.gov/pesticide-registration/pesticide-registration-manual

Louis Vaughn, Information Management Specialist
U.S. Environmental Protection Agency
OCSPP/OPP/ITRMD/ISB
(703)308-8114
vaughn.louis@epa.gov

Message

From: Holloman, Rachel [Holloman.Rachel@epa.gov]
Sent: 11/6/2017 1:10:52 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
CC: Kraft, Erik [Kraft.Erik@epa.gov]; Pahel, Lisa [Pahel.Lisa@epa.gov]
Subject: FW: Fomesafen IR-4 label comments
Attachments: Copy of S-Moc Fomesafen Indem SLNs.xlsx

Hi Kay, I would like to meet with you about the labels for Fomesafen. Based on Monty's email below and our conversation with him last week, it seems that these were handled differently than they are being done now. If you could let us know why they were done this way from the Agency's perspective, I would appreciated. Erik is out today, but let me know if you want to meet later this week. Thanks! Rachel

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Sunday, November 05, 2017 3:30 PM
To: Kraft, Erik <Kraft.Erik@epa.gov>
Cc: Pahel, Lisa <Pahel.Lisa@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>
Subject: RE: Fomesafen IR-4 label comments

Hi Erik,

Thank you and Rachel for the discussion last week on the 24C question related to the pending IR-4 Reflex label action. During our conversation, you asked how many of these have been issued and I indicated that for fomesafen, I did not know the exact number but that at least since 2006 when I took responsibility for this ai, all of our IR-4 uses were handled this way. To dig a bit further, I have checked and this has been not only the way we have supported IR-4 uses for Reflex (ai = fomesafen) but also for Dual Magnum (ai = S-metolachlor). The attached spreadsheet demonstrates how important these products are for minor use crop growers by the large number of Indemnified Section 24C labels that have been granted from 2003 until present.

There are some important considerations for the use of these products that make the Indemnified Section 24C the best approach. Many of these labeled use are in crops that may be very sensitive to the active ingredient in either Reflex or Dual Magnum (EPA Reg. No. 100-816). It is in consideration of this crop sensitivity that when a state seeks the use of one of these products for a known sensitive crop, Syngenta works closely with university scientists in that particular state to develop use directions that are best for the agronomic practices and conditions for that crop. These conditions are often determined to be both regionally and agronomically different. The ability to work with university cooperators to address these concerns has been a major consideration for supporting the IR-4 program to gain these uses for products like Reflex and Dual.

Another consideration beyond crop sensitivity is the complexity that would result from trying to put so many regionally specific use directions on a section 3 label. There are ~ 19 Reflex indemnified 24C labels currently registered that represent 18 different states. I am mindful that during our discussion, it was indicated that we would not have to retroactively bring the Reflex indemnified 24C labels on to our section 3 label but that future uses would be required to be listed on section 3 labels. Addition of these to a section 3 label would create significant complexity in the use directions moving forward and potentially a significant number of fast track label amendments when minor growers in different regions were to seek the use of these products to meet their needs. In light of the crop sensitivity considerations, these uses would still have to investigated on a state by state case basis with University scientists as is the current practice, but then the addition to the section 3 would requires a fast track amendment to get approved prior to making available to growers. This would also require

inclusion of a supplemental label to bring this product to the grower prior to production with the new section 3 label with the state specific minor use added.

In closing, we continue to support making products like Reflex available to support minor use growers who have limited tools to meet their needs and believe this historical approach has been of benefit to both IR4 and these growers. I therefore respectfully request your consideration of the concerns outlined above and that the previous approach using Indemnified Section 24C labels to support minor uses in cases where crop sensitivity is a factor may be considered appropriate moving forward.

Thank you for your thoughts on this matter and with kind regards,

Monty

From: Kraft, Erik [mailto:Kraft.Erik@epa.gov]
Sent: Monday, October 16, 2017 3:20 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Pahel, Lisa <Pahel.Lisa@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>
Subject: RE: Fomesafen IR-4 label comments

Hi Monty,

Sounds fine for the version a/b.

As long as you have tested mixtures and you are listing them for efficacy reasons such as work better together, provide better control, you use less of the tank mix product then it is ok to list tank mix name and rates. The maps look fine just as the long as the use sections have the info. somewhere. Also make sure that the minimum retreatment interval and max. total per year is available. This info is required per prn 2017-1&2 and also the label review manual.

We are waiting on Rachel's advise for the 24C issue as this is a first for me. I hope I answered all your questions, give me or Lisa a call or email if further guidance is needed.

Thanks
Erik

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Monday, October 16, 2017 3:06 PM
To: Pahel, Lisa <Pahel.Lisa@epa.gov>
Cc: Kraft, Erik <Kraft.Erik@epa.gov>
Subject: RE: Fomesafen IR-4 label comments

Good afternoon Lisa,

We are working on the requested changes to the labels from the message below. In the case of the Reflex (EPA Reg. No. 100-993) label, it appears that the requested edits were on version A (the original submission) as opposed to the revised version (version "B") which was provided to the Agency on October 11, 2016. At that time, it was indicated that the version B label would be able to replace the version A label. Consequently, the label reviewed does not have some EPA approved

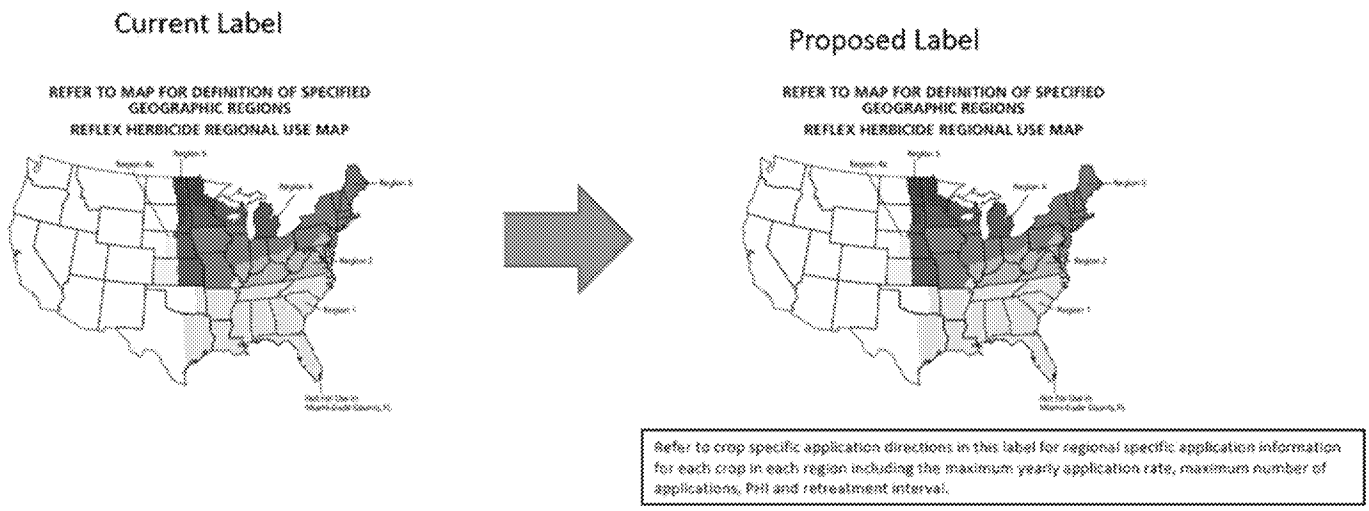
changes. In particular, the reference to Region 4a, which was added/approved in Feb 2016. I would propose, if acceptable to you, to use the version you have provided and we can make sure update this to be consistent with version B. To do so, we will make explicit where we have made changes to bring in line with the version B. Would this be acceptable?

There are a couple of other questions/required changes I would like to discuss as we are moving to complete the required changes

- Specifically, page 27 of the Reflex label in the section entitled **Reflex Tank Mixes for Preplant Surface or Preemergence Application,** the comment indicates "*throughout the label list only tank mix active ingredients, don't list product name or application rates*". This proposed change creates a difficult situation in that the products we recommend for tank mixes have been tested to confirm with Reflex to confirm that the formulations are compatible from a mixing perspective and that the mixed product is both efficacious for weed control and has acceptable crop safety. Listing only active ingredients would indicated that any products that contain these active ingredients could be tank mixed however, as mentioned, we have only tested the specified products and do not have confidence that other product with differences in formulations, not previously tested would meet those acceptability criteria. Thus we believe it would be best to retain the references to the specific products. Please let me know your thoughts on this.

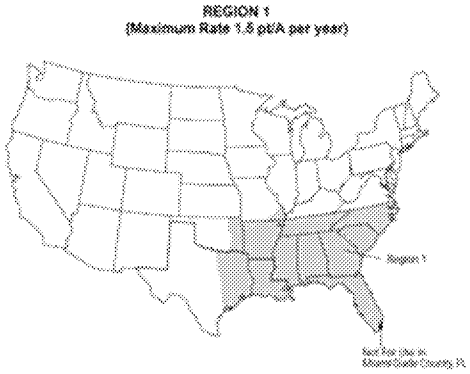
- The Reflex label contains a series of maps intended to specify the application rate maximum and frequencies in each geographic region. These maps start on page 17 with a general overview map that identifies the regions but not does not specify application rates or frequency.

The comment for this image was to: "throughout the label list maximum single application (of product and of ai/acre), list maximum yearly application rate, list maximum # of applications, list PHI, and list minimum retreatment interval". For this particular map, this will be difficult to do based upon the different rates, PHIs etc. for the different crops in each region. This map is intended just as a general overview. I propose that we include the following reference under this map to hopefully meet the intent of the required change. Please see screen clip of proposal below.



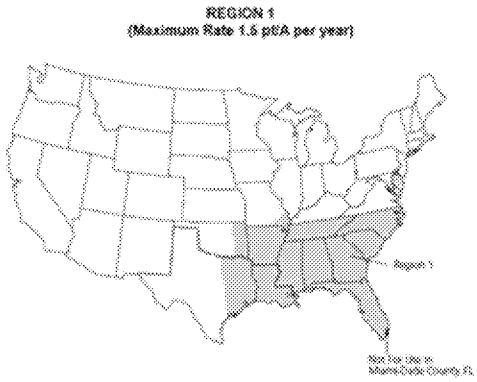
And for each region specific map, the same statement will be provided as shown in yellow:

Current Label



Includes the following states or portion of states where Reflex Herbicide may be applied		
Region 1	Alabama	All areas
	Arkansas	All areas
	Florida	All areas except for Miami-Dade County
	Georgia	All areas
	Louisiana	All areas
	Mississippi	All areas
	Missouri	Counties of Bollinger, Butler, Cape Girardeau, Dunklin, Madison, Mississippi, New Madrid, Pemiscot, Perry, Ripley, Scott, Stoddard and Wayne
	North Carolina	All areas
	Oklahoma	All areas east of U.S. Highway 75 and East of Indian Nation Parkway
	South Carolina	All areas
	Tennessee	All areas
	Texas	All areas east of U.S. Highway 77 to State Road 236 including all of Calhoun County

Proposed Label



Includes the following states or portion of states where Reflex Herbicide may be applied		
Region 1	Alabama	All areas
	Arkansas	All areas
	Florida	All areas except for Miami-Dade County
	Georgia	All areas
	Louisiana	All areas
	Mississippi	All areas
	Missouri	Counties of Bollinger, Butler, Cape Girardeau, Dunklin, Madison, Mississippi, New Madrid, Pemiscot, Perry, Ripley, Scott, Stoddard and Wayne
	North Carolina	All areas
	Oklahoma	All areas east of U.S. Highway 75 and East of Indian Nation Parkway
	South Carolina	All areas
	Tennessee	All areas
	Texas	All areas east of U.S. Highway 77 to State Road 236 including all of Calhoun County
Refer to crop specific application directions in this label for regional specific application information for each crop in each region including the maximum yearly application rate, maximum number of applications, PHI and retreatment interval.		

Within each crop use section, we would propose to add the following table to meet the indicated need to "throughout the label list maximum single application (of product and of ai/acre), list maximum yearly application rate, list maximum # of applications, list PHI, and list minimum retreatment interval". This table would be added in the restrictions sections for each crop on the label.

Reflex Herbicide Use Restrictions for Soybeans

Region	Maximum Single Application Reflex Rate (pt/A)	Maximum Single Application Reflex Rate (lb fomesafen/A)	Maximum Number Applications	PHI (days)
1	1.5	0.3785	1 per year	45
2	1.5	0.3785	1 every two years	45
3	1.25	0.313	1 every two years	45
4	1	0.25	1 every two years	45
4a	1	0.25	1 every two years	45
5	0.75	0.1875	1 every two years	45

Refer to Reflex Herbicide Regional Use Maps for the geographic definition of each region.
Do not graze treated areas or harvest for forage or hay.

Thank you for your time in considering these questions and please let me know if I can provide any additional information. If helpful, I would be happy to call you to discuss at your convienence.

With kind Regards,

Monty

From: Pahel, Lisa [mailto:Pahel.Lisa@epa.gov]
Sent: Thursday, October 12, 2017 10:13 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Kraft, Erik <Kraft.Erik@epa.gov>
Subject: Fomesafen IR-4 label comments

Hi Monty,

Please see the attached label comments for the fomesafen IR-4 submission, and let me know if you have any questions.

Thanks,
Lisa

Lisa Pahel
Environmental Protection Specialist
Fungicide and Herbicide Branch
Registration Divison
Office of Pesticide Programs
703-347-0459

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Message

From: Adeeb, Shanta [Adeeb.Shanta@epa.gov]
Sent: 6/2/2016 5:02:24 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: FW: Dicamba technical additional uses
Attachments: Clarity herbicide Approval 007969-00137-20110401.pdf

Kay,

Please let me know if you are ok with the explanation below for the crops added to this product or if the registrant needs to provide a data matrix.

Thanks,

Shanta

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Thursday, June 02, 2016 11:24 AM
To: Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Subject: Dicamba technical additional uses

Hello Shanta,

Thank you for the call concerning the justification/documentation necessary to support the addition of Conservation Reserve Program Areas, Fallow Systems, Pasture and Rangeland uses on the Dicamba Herbicide Technical (7969-132) labeling. These are in fact existing uses for which BASF has complete data ownership, but for some reason had failed to include as existing use sites on the technical label. To support the existence of these uses on BASF dicamba end-use-product label, I have attached a copy of the current Clarity herbicide labeling.

Thank you for your assistance with this amendment. Please let me know if you have any further questions or concerns.

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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From: Adeeb, Shanta [mailto:Adeeb.Shanta@epa.gov]
Sent: Thursday, October 08, 2015 1:49 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>
Subject: Letter for EPA Reg. No. 7969-141

Good Afternoon Dr. Birk,

Please see the attached agency letter for EPA Reg. No. 7969-141. Please confirm receipt.

Regards,

Shanta Adeeb, M.S.
Risk Manager
Herbicide Branch
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Email: adeeb.shanta@epa.gov
Number: 703-347-0502

Message

From: Parker, James [Parker.James@epa.gov]
Sent: 7/21/2016 1:14:55 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]; Moriarty, Thomas [Moriarty.Thomas@epa.gov]; Anderson, Neil [Anderson.Neil@epa.gov]
Subject: RE: Transfer 62719 RAD 10163 - ethalfluralin

Thanks Kathryn!

Lol. No I don't get those, but I found out after speaking with some contact at Dow. Sill I really appreciate you thinking of us and sharing the email below...

Thanks again,
James P.

From: Montague, Kathryn V.
Sent: Thursday, July 21, 2016 9:01 AM
To: Parker, James <Parker.James@epa.gov>; Moriarty, Thomas <Moriarty.Thomas@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Subject: FW: Transfer 62719 RAD 10163 - ethalfluralin

FYI – not sure if you get these updates from ITRMD.

From: Vaughn, Louis
Sent: Wednesday, July 20, 2016 3:33 PM
To: Vinjamuri, Santa <Vinjamuri.Santa@epa.gov>; Adams, Teretha <Adams.Teretha@epa.gov>; Dillard, Sylvia <Dillard.Sylvia@epa.gov>
Cc: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: FW: Transfer 62719 RAD 10163

For your records and jackets.

Lou Vaughn – OCSPP/OPP/ITRMD

From: Vaughn, Louis
Sent: Wednesday, July 20, 2016 3:31 PM
To: 'Hobson, Eric (E)' <EAHOBSON@dow.com>; kssmith@gowanco.com
Subject: Transfer 62719 RAD 10163

Attached, is the requested Registration and Data Transfer from **DOW AGROSCIENCES LLC**, company number **62719** to **GOWAN COMPANY**, company number **10163.** You transferred 3 Product Registrations, 8 SLN's and 294 MRIDs (No Exclusive Use). The products are now:

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
ETHALFLURALIN TECHNICAL	62719-132	10163-354
SONALAN 10G	62719-184	10163-355
SONALAN HFP	62719-188	10163-356

SLN Number	Old Registrant/ Company Number	New Registrant/ Company Number
ID950020	62719	10163
MT010002	62719	10163
MT060003	62719	10163
ND050010	62719	10163
ND090004	62719	10163
NV950001	62719	10163
WA940018	62719	10163
WY030005	62719	10163

Best regards.

For Change of Address or Agent:
http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-how-report-changes-company-name-or-address

For Product Transfers, Data Transfers or Company Numbers Transfers:
http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-16-transfer-product-registrations-and

For Other Information: http://www2.epa.gov/pesticide-registration/pesticide-registration-manual

Louis Vaughn, Information Management Specialist
U.S. Environmental Protection Agency
OCSPP/OPP/ITRMD/ISB
(703)308-8114
vaughn.louis@epa.gov

Message

From: Ondish, Mindy [ondish.mindy@epa.gov]
Sent: 11/5/2018 4:57:13 PM
To: Bauer, Elaine [EKBauer@dow.com]
CC: Brown, Ronda (RR) [RRBrown2@dow.com]; Montague, Kathryn V. [Montague.Kathryn@epa.gov]; Kraft, Erik [Kraft.Erik@epa.gov]; Zhuang, Meibao (M) [MZhuang@dow.com]; Ouimette, David (D) [DGOuimette@dow.com]
Subject: RE: Teff new use action

Thanks, Elaine! We will file this label for future reference to facilitate SLN registrations.

Mindy

From: Bauer, Elaine [mailto:EKBauer@dow.com]
Sent: Monday, November 05, 2018 11:52 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>; Zhuang, Meibao (M) <MZhuang@dow.com>; Ouimette, David (D) <DGOuimette@dow.com>
Subject: RE: Teff new use action

Hi, Mindy. Attached is the revised draft SLN for GoldSky in which I made the following revisions per your recommendation:

- Added max number of applications per year.
- Revised max rate to remove "per growing season" and include "per year."
- Added grazing and haying restrictions from the Sec 3 label (in lieu of referencing wheat restrictions on the main label).

Let me know if you need anything else. Thanks for your help.

Elaine

Elaine Bauer
Crop Protection Regulatory Specialist, US Regulatory Affairs
Corteva Agriscience™, Agriculture Division of DowDuPont
Dow AgroSciences
Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268
Contact: 317-337-4073 or ekbauer@dow.com

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Monday, November 05, 2018 9:20 AM
To: Bauer, Elaine <EKBauer@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>; Zhuang, Meibao (M) <MZhuang@dow.com>; Ouimette, David (D) <DGOuimette@dow.com>
Subject: RE: Teff new use action

Good Morning Elaine,

Can you revise the SLN again as indicated? Even though teff is an annual crop, we like the labels to specify restrictions in both "per growing season" and "per year." I also suggested including the actual grazing and haying restrictions rather than referring back to the wheat section. Thanks.

Mindy

From: Bauer, Elaine [mailto:EKBauer@dow.com]
Sent: Friday, November 02, 2018 3:55 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>; Zhuang, Meibao (M) <MZhuang@dow.com>; Ouimette, David (D) <DGOuimette@dow.com>
Subject: RE: Teff new use action

Hi, Mindy.

Attached is the revised draft 24(c) for GoldSky, on which I changed "per growing season" to "per year" under the restrictions.

Please let me know if you require anything more regarding this label.

Thanks, and have a great weekend. -Elaine

Elaine Bauer
Crop Protection Regulatory Specialist, US Regulatory Affairs
Corteva Agriscience™, Agriculture Division of DowDuPont
Dow AgroSciences
Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268
Contact: 317-337-4073 or ekbauer@dow.com

From: Zhuang, Meibao (M)
Sent: Thursday, November 01, 2018 10:54 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>; Ouimette, David (D) <DGOuimette@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Bauer, Elaine <EKBauer@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>
Subject: RE: Teff new use action

Mindy,

Attached please find the three technical labels revised based on your feedback. I will send you the revised GlodSky 24c shortly once our internal review is completed. Apology for the delayed response and confusions. David and I are working on the transition plan and I will be working with you on the future communications for the three molecules (Florasulam, Fluroxypyr, and Pyroxsulam).

DAS has submitted formal requests for the unconditional notice of registration for Florasulam wet cake technical. Erik would be able to give you the up-to-date status of the application if needed. I have been working closely with him in the past few weeks on the request.

With regard to the approaching PRIA due date, would it be beneficial to EPA if DAS requests a PRIA timeline extension of 1-2 weeks? I would be more than happy to discuss with you further if you have additional questions on the application. Please let me know.

Thanks,

-Meibao

Meibao Zhuang, Ph.D.
US Crop Protection Regulatory Leader
Corteva Agriscience™, Agriculture Division of DowDuPont™
Office: 317.337.3689
Email: mzhuang@dow.com

Dow AgroSciences LLC
9330 Zionsville Road, Indianapolis, IN 46268

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Thursday, November 01, 2018 9:58 AM
To: Ouimette, David (D) <DGOuimette@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Zhuang, Meibao (M) <MZhuang@dow.com>; Bauer, Elaine <EKBauer@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>
Subject: RE: Teff new use action
Importance: High

Hi David,

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Please contact me today if possible so we can discuss.

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Cc: 'Brown, Ronda (RR)' <RRBrown2@dow.com>; 'Zhuang, Meibao (M)' <MZhuang@dow.com>; 'Bauer, Elaine' <EKBauer@dow.com>
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Please see attached labels. Let me know if you have any questions and thanks for your help.

David Ouimette, Ph.D.
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Office: 317.337-4562 dgouimette@dow.com

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Subject: RE: Teff new use action
Attachments: 062719-00582.20181105.R365-006 GoldSky Sec 24c Teff 2018.11.05d.pdf

Hi, Mindy. Attached is the revised draft SLN for GoldSky in which I made the following revisions per your recommendation:

- Added max number of applications per year.
- Revised max rate to remove "per growing season" and include "per year."
- Added grazing and haying restrictions from the Sec 3 label (in lieu of referencing wheat restrictions on the main label).

Let me know if you need anything else. Thanks for your help.

Elaine

Elaine Bauer
Crop Protection Regulatory Specialist, US Regulatory Affairs
Corteva Agriscience™, Agriculture Division of DowDuPont
Dow AgroSciences
Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268
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Attached is the revised draft 24(c) for GoldSky, on which I changed "per growing season" to "per year" under the restrictions.

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Thanks, and have a great weekend. -Elaine

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DAS has submitted formal requests for the unconditional notice of registration for Florasulam wet cake technical. Erik would be able to give you the up-to-date status of the application if needed. I have been working closely with him in the past few weeks on the request.

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Meibao Zhuang, Ph.D.
US Crop Protection Regulatory Leader
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Office: 317.337.3689
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Sent: 11/5/2018 4:32:30 PM
To: Ondish, Mindy [ondish.mindy@epa.gov]
CC: Holloman, Rachel [Holloman.Rachel@epa.gov]; Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: RE: Teff new use action

That's fine, but it would be ok with just the 1st and 3rd.

From: Ondish, Mindy
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Cc: Holloman, Rachel <Holloman.Rachel@epa.gov>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: RE: Teff new use action

How's this?

- Do not make more than one application of GoldSky per year.
- Do not apply more than 1 pint/acre of GoldSky (0.0023 lb/acre florasulam, 0.09 lb/acre fluroxypyr, 0.013 lb/acre pyroxsulam) per crop.
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Mindy,

Our branch does "per year" only. If the registrant wants to add "per season" they need to specify how many per seasons there are per year, and specify the amount per season and per year. With teff you get 2+ cuttings per year. When you state "per growing season" what does that for a crop when it is harvested more than once per year, and what about pre-emergent applications to the crop and post-harvest applications. That is why we go with per year.

Thanks
Erik

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Would you be OK if we specified both so there's no debate? The science divisions want both to be spelled out usually, because just saying "per year" is also troublesome. The point is to clarify for risk assessment purposes because some crops can have multiple cuttings, which is not the case for teff. We're also adding restriction to only apply once, so

there's no chance the same crop would get a second dose for this particular use. Either way, these aren't getting stamped since we're not approving any SLNs with this action.

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Our preferred labeling is "per year" not "per year or per growing season".

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To: Ouimette, David (D) <DGOuimette@dow.com>
Subject: Teff new use action

Hi David,

The PRIA due date is approaching (11/5/18), and we have published final rules establishing tolerance on teff commodities for fluroxypyr, fluasulam, pyroxsulam, and cloquintocet-mexyl.

Will you be adding "teff" to the 3 technical labels (62719-285, -559, -567)? Even though you cannot add teff to the section 3 label for the end-use product Goldsky, you can and should add this to the technical labels. Please submit proposed technical labels adding "teff."

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Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

Message

From: AMBROSE, RICHARD J [Richard.J.Ambrose@dupont.com]
Sent: 9/8/2016 2:29:43 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
CC: US_RegDocs (USREG2@nanotes1.email.dupont.com) [USREG2@nanotes1.email.dupont.com]; Klinefelter, Christine M [Christine.M.Klinefelter@dupont.com]
Subject: DuPont™ Travallas™ herbicide example packaging labels for your records
Attachments: A10000883 R1 Travallas clean 2.5 gal ECL.pdf; A10000883 R1 Travallas 2.5gal ECL.pdf; 20160805TravallasFinPrintLabscan352-896.pdf

Hi Kathryn,

On August 5, 2016 I submitted the final printed labeling for DuPont™ Travallas™ herbicide (EPA Reg. No. 352-896) which included a paper copy and electronic copy (File ID: 000352-00896.20160805.SL-1980 072716 07-27-16.Travallas.pdf) of the specimen label.

Attached to this email is an example packaging label for your records. In addition, I attached a scanned copy of the final printed labeling submission for your reference.

Thanks again for your review.
Regards,
Rick

Richard J. Ambrose | DuPont Crop Protection | U.S. Product Registration Manager | Stine Haskel Research Center S300/416, 1090 Elkton Road, P.O. Box 30, Newark, Delaware 19714 | (302) 366-5185 Office | (302) 528-3764 Mobile

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

Message

From: Bauer, Elaine [EKBauer@dow.com]
Sent: 11/2/2018 7:55:25 PM
To: Ondish, Mindy [ondish.mindy@epa.gov]
CC: Brown, Ronda (RR) [RRBrown2@dow.com]; Montague, Kathryn V. [Montague.Kathryn@epa.gov]; Kraft, Erik [Kraft.Erik@epa.gov]; Zhuang, Meibao (M) [MZhuang@dow.com]; Ouimette, David (D) [DGOuimette@dow.com]
Subject: RE: Teff new use action
Attachments: 062719-00582.20181102.R365-006 GoldSky Sec 24c Teff 2018.11.02d.pdf

Hi, Mindy.

Attached is the revised draft 24(c) for GoldSky, on which I changed "per growing season" to "per year" under the restrictions.

Please let me know if you require anything more regarding this label.

Thanks, and have a great weekend. -Elaine

Elaine Bauer
Crop Protection Regulatory Specialist, US Regulatory Affairs
Corteva Agriscience™, Agriculture Division of DowDuPont
Dow AgroSciences
Bldg 308/2E, 9330 Zionsville Road, Indianapolis, IN 46268
Contact: 317-337-4073 or ekbauer@dow.com

From: Zhuang, Meibao (M)
Sent: Thursday, November 01, 2018 10:54 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>; Ouimette, David (D) <DGOuimette@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Bauer, Elaine <EKBauer@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>
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discuss with you further if you have additional questions on the application. Please let me know.

Thanks,

-Meibao

Meibao Zhuang, Ph.D.
US Crop Protection Regulatory Leader
Corteva Agriscience™, Agriculture Division of DowDuPont™
Office: 317.337.3689
Email: mzhuang@dow.com

Dow AgroSciences LLC
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Mindy Ondish

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Please see attached labels. Let me know if you have any questions and thanks for your help.

David Ouimette, Ph.D.
U.S. Regulatory Leader
Corteva Agriscience™, Agriculture Division of DowDuPont™
Office: 317.337-4562 dgouimette@dow.com

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Mindy,

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Message

From: Kraft, Erik [Kraft.Erik@epa.gov]
Sent: 11/2/2018 3:24:56 PM
To: Holloman, Rachel [Holloman.Rachel@epa.gov]
CC: Joyner, Shaja [Joyner.Shaja@epa.gov]; Ondish, Mindy [ondish.mindy@epa.gov]; Montague, Kathryn V. [Montague.Kathryn@epa.gov]; Koch, Erin [Koch.Erin@epa.gov]
Subject: RE: Teff new use action - FOR SIGNATURE PRIA 11/5

Rachel,

Deliberative Process / Ex. 5

Thanks
Erik

From: Kraft, Erik
Sent: Friday, November 02, 2018 11:21 AM
To: Holloman, Rachel <Holloman.Rachel@epa.gov>
Cc: Joyner, Shaja <Joyner.Shaja@epa.gov>
Subject: FW: Teff new use action - FOR SIGNATURE PRIA 11/5

Rachel,

Since this is a new use and a branch chief needs to sign pleas see Mindy's email below for -567 &-559.

Shaja,

If you want to sign please go ahead since you are acting, these are actions that Mindy has been handling in HB.

Thanks
Erik

From: Ondish, Mindy
Sent: Friday, November 02, 2018 10:50 AM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>
Subject: FW: Teff new use action - FOR SIGNATURE PRIA 11/5

Kay: Please sign 62719-285
Erik: Please sign 62719-567 & 62719-559. Kay and I suggest that you process the unconditional registration request for 62719-559 prior to signing this new use.

Not sure if you both want to sign these on the same day, but the PRIA is on Monday.

Thanks,
Mindy

From: Brown, Ronda (RR) [mailto:RRBrown2@dow.com]
Sent: Friday, November 02, 2018 7:48 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>; Zhuang, Meibao (M) <MZhuang@dow.com>; Ouimette, David (D) <DGOuimette@dow.com>
Cc: Bauer, Elaine <EKBauer@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik

<Kraft.Erik@epa.gov>
Subject: RE: Teff new use action

Mindy,

Please find attached the revised Starane F Technical and Florasulam Wet Cake Technical labels (one for each with edits and clean copies) per your request. If you need anything further, please let me know.

Ronda Brown
Registration Specialist
Bldg 308/2E-225
9330 Zionsville Road, Indianapolis, IN 46268
Office: 317.337.4563 rrbrown2@dow.com
Corteva Agriscience™
Agriculture Division of DowDuPont™

Taking one breath, one step, one day at a time.

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Friday, November 02, 2018 6:59 AM
To: Zhuang, Meibao (M) <MZhuang@dow.com>; Ouimette, David (D) <DGOuimette@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Bauer, Elaine <EKBauer@dow.com>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Kraft, Erik <Kraft.Erik@epa.gov>
Subject: RE: Teff new use action

Meibao,

Can you revise Starane and Florasulam Wet Cake labels again? See attached.

Mindy

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Sent: Thursday, November 01, 2018 10:54 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>; Ouimette, David (D) <DGOuimette@dow.com>
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Meibao Zhuang, Ph.D.
US Crop Protection Regulatory Leader
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Office: 317.337.3689
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Subject: RE: Teff new use action
Attachments: Florasulam Wet Cake Technical-559 16Oct18d.pdf; 062719-00567.20181018.Pyroxsulam MC-567 2018.10.18d Clean.pdf; Starane F Technical-285 16Oct18d.pdf

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U.S. Regulatory Leader
Corteva Agriscience™, Agriculture Division of DowDuPont™
Office: 317.337-4562 dgouimette@dow.com

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Thursday, October 11, 2018 2:15 PM
To: Ouimette, David (D) <DGOuimette@dow.com>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Zhuang, Meibao (M) <MZhuang@dow.com>
Subject: RE: Teff new use action

David,

No - it does not require a formal submission since it's tied to this new use action. Please email the proposed technical labels to me directly as clean PDFs, and be sure to incorporate any recent notification changes, etc. from the previously-approved version.

Mindy

From: Ouimette, David (D) [mailto:DGOuimette@dow.com]
Sent: Thursday, October 11, 2018 11:42 AM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Cc: Brown, Ronda (RR) <RRBrown2@dow.com>; Zhuang, Meibao (M) <MZhuang@dow.com>
Subject: RE: Teff new use action

Mindy,

Thanks for your message. As per your request, we will add teff to the technical labels for florasulam, fluroxypyr and pyroxsulam. I assume the amended labels should be submitted as "fast track" amendments with no PRIA action required?

Dave Ouimette

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Thursday, October 11, 2018 10:49 AM
To: Ouimette, David (D) <DGOuimette@dow.com>
Subject: Teff new use action

Hi David,

The PRIA due date is approaching (11/5/18), and we have published final rules establishing tolerance on teff commodities for fluroxypyr, fluasulam, pyroxsulam, and cloquintocet-mexyl.

Will you be adding "teff" to the 3 technical labels (62719-285, -559, -567)? Even though you cannot add teff to the section 3 label for the end-use product Goldsky, you can and should add this to the technical labels. Please submit proposed technical labels adding "teff."

Also, I'm confirming that we will not be approving section 3 registration on teff use for end-use product (i.e. Goldsky Herbicide) since there is indemnification language associated with the use. SLNs for specific states can be submitted after we approve the new use.

Mindy Ondish
Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

Message

From: Benbow, Bethany [benbow.bethany@epa.gov]
Sent: 6/25/2018 10:38:35 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: RE: S-metolachlor lettuce question

Thanks Kay!

Hope you had a nice weekend!
If you have any labels for me, feel free to send them when you get a chance. "Be careful what you wish for"…right? ☺

From: Montague, Kathryn V.
Sent: Monday, June 25, 2018 3:00 PM
To: Benbow, Bethany <benbow.bethany@epa.gov>
Subject: FW: S-metolachlor lettuce question

FYI, meant to cc you on the reply…I got the info from Monty Dixon.

From: Orrick, Greg
Sent: Monday, June 25, 2018 2:58 PM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: Farruggia, Frank <Farruggia.Frank@epa.gov>; Bongard, Christian <bongard.christian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Antoline, Joshua <antoline.joshua@epa.gov>
Subject: RE: S-metolachlor lettuce question

Very helpful. Much appreciated, Kay!

From: Montague, Kathryn V.
Sent: Monday, June 25, 2018 2:57 PM
To: Orrick, Greg <Orrick.Greg@epa.gov>
Cc: Farruggia, Frank <Farruggia.Frank@epa.gov>; Bongard, Christian <bongard.christian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Antoline, Joshua <antoline.joshua@epa.gov>
Subject: S-metolachlor lettuce question

Hi, Greg,

As I suspected, Syngenta has not put the lettuce use on the section 3 label due to indemnification needs. Here is the only active SLN with the use, and a copy of the original petition, which describes the directions for use on lettuce. Hope this helps.

Best Regards,
Kay

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Friday, June 22, 2018 9:12 AM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: RE: S-metolachlor question

Hi Kay,

I am attaching the tolerance petition submitted in support of this action. This was submitted on Feb 7, 2014. As you indicated below, this IR4 use was supported by Syngenta as an indemnified 24(C) which is why it would not be included on a section 3 label. This petition defines the use directions on pages 4 and 5 of the petition (9 and 10 of the pdf). A summary of the residue data for leaf lettuce is given starting on page 60 of the pdf and head lettuce on page 77. I have checked with our state registration team and it appears we only have 1 active 24C with lettuce (NY), which I have attached in the event it may be helpful.

Please let me know if this helps. If you need more let me know and I can do some additional digging.

With Kind Regards,

Monty

From: Orrick, Greg
Sent: Thursday, June 21, 2018 10:58 AM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Benbow, Bethany <benbow.bethany@epa.gov>
Cc: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Antoline, Joshua <antoline.joshua@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>
Subject: S-metolachlor label with lettuce

Hi Kay and Bethany,

I hope things are going well. Josh is working on the registration review PRA for S-metolachlor and needs a label that has use on lettuce. We assessed a proposed new use on lettuce in January 2015 in a memo that was addressed to you. So, I wonder if you can point us to a stamped label that has the new use. Or, if I should be contacting a different team, please let me know who to contact.

Thank you for your help,
Greg

GREGORY ORRICK | ENVIRONMENTAL SCIENTIST | *U.S. EPA, OFFICE OF PESTICIDE PROGRAMS* | *PHONE: 703.305.6140*

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/22/2018 1:11:39 PM
To: Montague, Kathryn V. [Montague.Kathryn@epa.gov]
Subject: RE: S-metolachlor question
Attachments: SMOC Petition including lettuce.pdf; NY0816055EA1016_NY-110004.pdf

Hi Kay,

I am attaching the tolerance petition submitted in support of this action. This was submitted on Feb 7, 2014. As you indicated below, this IR4 use was supported by Syngenta as an indemnified 24(C) which is why it would not be included on a section 3 label. This petition defines the use directions on pages 4 and 5 of the petition (9 and 10 of the pdf). A summary of the residue data for leaf lettuce is given starting on page 60 of the pdf and head lettuce on page 77. I have checked with our state registration team and it appears we only have 1 active 24C with lettuce (NY), which I have attached in the event it may be helpful.

Please let me know if this helps. If you need more let me know and I can do some additional digging.

With Kind Regards,

Monty

From: Montague, Kathryn V. [mailto:Montague.Kathryn@epa.gov]
Sent: Thursday, June 21, 2018 3:20 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: S-metolachlor question

Glad to hear you're doing well, we're all ok too. Nonresponsive Discussion of Personal Matters / Ex. 6

Nonresponsive Discussion of Personal Matters / Ex. 6

I'm trying to remember back to when you added lettuce (along with a bunch of other crops) via an IR-4 petition. Looks like we registered all of those uses in July, 2015. But I'm having a hard time finding an end-use label with lettuce on it. Is this one of those situations where you registered it, but don't want the directions on a stamped Section 3 label so that you can use indemnification language via Special Local Needs labels??

I'm asking because EFED/PRD asked me to point them to a label with the directions for lettuce, and I can't find one. Assuming it's the situation described above, do you remember how we got the use info for our assessments? Maybe an earlier draft label, or a separate document/cover letter? Shanta Adeeb handled this one, and she's on a detail, so I can't really find out from her. I think EFED just wants to look back over the use directions as part of the reg review process.

Thank you,
Kay

From: Dixon Monty USGR [mailto:monty.dixon@syngenta.com]
Sent: Thursday, June 21, 2018 3:14 PM

To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: RE: S-metolachlor question

Hi Kay,

Great to hear from you. All is well with me and I hope for you and your family as well. Amanda Foderaro is our S-metolachlor lead but she is out on maternity leave so I am covering for her. Please let me know what the question is and I be happy to get you an answer.

With Kind Regards,

Monty

From: Montague, Kathryn V. [mailto:Montague.Kathryn@epa.gov]
Sent: Thursday, June 21, 2018 3:11 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: S-metolachlor question

Hi, Monty,

I'm back from my detail. Hope all is well with you. I can't remember - do you handle S-metolachlor?? I have a question about lettuce.

Thank you,
Kay

Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division
Office of Pesticide Programs
(703)305-1243

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Message

From: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Sent: 2/16/2017 6:59:22 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – she accepted the Outlook invite. Although we haven't prepped anything.

From: Goodis, Michael
Sent: Thursday, February 16, 2017 1:57 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Is Meredith joining you?
It would be good for her if she did.

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

Phone 703-308-8157
Room S7624

From: Rosenblatt, Daniel
Sent: Thursday, February 16, 2017 12:32 PM
To: OPP RD Managers <OPP_RD_Managers@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Eagle, Venus <Eagle.Venus@epa.gov>
Subject: FW: Clarification and Discussions w/ CLA RC members on several topics of interest?

All – this follows up yesterday's RD staff meeting. Please read down the list below of topics and provide me with some feedback or summary on where things stand on the issues and/or the points that you'd like me to stress about that topic. There's probably a sorting or logical lead that applies to each point. For instance – Deborah (and Debra) I think should handle the 98-10 issue and Cynthia (and Heather) would be the best on the first aid – I believe. Some of the other ones – I don't know about or there may not be a real lead here on that issue.

Stepping away from their agenda points - are there any key reminders or overarching 'pain points' on our side that you'd like me to bring up?

I'm asking for your feedback by NLT 2/21 – COB, since the meeting itself is on 2/22. Thanks.

From: Rosenblatt, Daniel
Sent: Wednesday, February 15, 2017 9:18 AM
To: 'Hamilton, Robert' <Robert.Hamilton@valent.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sounds good.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Wednesday, February 15, 2017 9:12 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, our group will plan to come over on Wednesday 2/22 to meet with you at 2pm for an hour. We'll plan to arrive a few minutes early and I'll call you to let you know we're in the lobby, if that works for you. Let me know if you want to do it differently, or if you want me to call someone else to escort us to your floor.

Here is a list of the topics that we would like to discuss. We really appreciate the opportunity to informally meet with you.

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- First aid clarification memo next steps
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?
- Items that you would like to discuss with registrants.

Thank you very much, see you next week!

Best,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 5:21 PM
To: Hamilton, Robert
Cc: Ray McAllister (RMcAllister@croplifeamerica.org); Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sure. Something that's informal works too.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 3:15 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

I'm glad to know that the time still works for you, we'll plan on it.

Historically, this has just been an informal discussion between CLA RC leadership and the RD deputy on a few topics to get your perspective and feedback. We'd like to see if we can find common ground to move forward on items which we both have interest in progressing. No preparation necessary, nor firm commitments required on your part. We just would appreciate the opportunity to visit and get your perspective. We will work on refining the list of topics and I will send them to you in advance of the meeting.

Make sense?

Thank you for your willingness to meet with us.

Best regards,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 12:05 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob - Yes – our meeting on 2/22 is still clear for my calendar. It would be good though to refine the topic list soon so that as needed additional EPAers can be there to have a really productive discussion.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 11:22 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

We are still planning for February 22 at 2pm. Does that still work for you? As we get a little closer, I'll send you an updated topic list.

Thank you very much for agreeing to meet with us.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, November 21, 2016 5:29 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob – All – I missed coordinating today with others from EPA on this. (And I'm about to take some time away due to Thanksgiving). So just to get out an immediate answer – sure – I'd propose that you all come over to EPA's Arlington building at say 2 pm on 2/22/17 for this. Does that work? I have a meeting room we can use. But we can adjust that timing and the agenda as it gets closer.

Dan

Daniel J. Rosenblatt, Deputy Director
Registration Division, Office of Pesticide Programs
e-mail: rosenblatt.dan@epa.gov
Phone: (703) 308-9366
URL: www.epa.gov/pesticides

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, November 21, 2016 11:10 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

The CLA Registration Committee leadership has a standing tradition of informally meeting with an RD Deputy to discuss current topics of interest.
We have been meeting with Jeff, but now that he is in FEAD, we wonder if either you, or you and Jeff would be able to meet with us for an hour early in the new year. The way that this has worked in the past is that a few members of the CLA RC would come over to the Agency to meet with you to discuss topics of interest. This has traditionally been just a small, informal working session where we identify key issues and how we may be able to move the items forward. Topics that we would like to cover include:

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- Timing of first aid clarification memo
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?

We would like the opportunity to open the discussion with you and look forward to working with you. Please let me know if you have items that you would like to add to the list, we'd be happy to add them.
Our members will be in town on February 21, so if you have an hour on the 22nd, a few of us could plan to come over to the Agency to meet with you.

Will that work? If not, we can work to find the next available time.

Thank you,

Bob Hamilton

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Thursday, April 14, 2016 7:21 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra; Lewis, Susan; BCSReg_Archive
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

OK, sounds good. See you at 1:30.

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Thursday, April 14, 2016 6:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – After polling our member companies, we have added a few topics to the list so I wanted to forward it to you in advance of the meeting (below). It is possible we won't be able to cover every topic within the 1 hour slot (1:30 – 2:30) so we may need further discussions.

- Next printing/Released for Shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions
- Tolerance petition section F crop groups versus labeling with crop groups/processed commodities
- Placement of first aid statement – 40 CFR 156.10
- Database of conditional registration data submitted to Agency available to the public?
- We have received info that the Agency is rotating reviewers within team every 3 months – further clarification?

Currently, participants from our side will be: Ray McAllister, Bob Hamilton, Jack Cain and me. Thanks for your willingness to meet with us.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
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51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:59 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

At the most 4 – 5 folks from our side.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division

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51368 Leverkusen, Germany

Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Friday, April 08, 2016 8:54 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com); Jack.Cain@dupont.com; BCSReg_Archive; Rate, Debra; Lewis, Susan
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Let me check and get back to you. How many people from your side would be attending?

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>
Subject: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – as a follow-up to previous discussions with CLA members, we would like to visit with you at your convenience and get further clarification and/or guidance on the following topics:

- Next printing/released for shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions

Several of the members will be in town next week attending the CLA Spring Conference so we would propose meeting either Wed or Thurs (4/13 or 4/14) for approximately 1 hr during 10:00 to 11:30 AM or 1:00 – 4:00 PM. Would you be available during any of those times?

Thanks in advance!

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
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51368 Leverkusen, Germany

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Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

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Message

From: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Sent: 1/24/2017 2:14:02 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – good. I will invite her.

From: Goodis, Michael
Sent: Tuesday, January 24, 2017 7:51 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Dan

Is Meredith going with you?
It may be good experience for her in her acting role.

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

Phone 703-308-8157
Room S7624

From: Rosenblatt, Daniel
Sent: Monday, January 23, 2017 12:05 PM
To: Hamilton, Robert <Robert.Hamilton@valent.com>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob - Yes – our meeting on 2/22 is still clear for my calendar. It would be good though to refine the topic list soon so that as needed additional EPAers can be there to have a really productive discussion.

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Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

We are still planning for February 22 at 2pm. Does that still work for you? As we get a little closer, I'll send you an updated topic list.

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Sent: Monday, November 21, 2016 5:29 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob – All – I missed coordinating today with others from EPA on this. (And I'm about to take some time away due to Thanksgiving). So just to get out an immediate answer – sure – I'd propose that you all come over to EPA's Arlington building at say 2 pm on 2/22/17 for this. Does that work? I have a meeting room we can use. But we can adjust that timing and the agenda as it gets closer.

Dan

Daniel J. Rosenblatt, Deputy Director
Registration Division, Office of Pesticide Programs
e-mail: rosenblatt.dan@epa.gov
Phone: (703) 308-9366
URL: www.epa.gov/pesticides

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, November 21, 2016 11:10 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

The CLA Registration Committee leadership has a standing tradition of informally meeting with an RD Deputy to discuss current topics of interest.
We have been meeting with Jeff, but now that he is in FEAD, we wonder if either you, or you and Jeff would be able to meet with us for an hour early in the new year. The way that this has worked in the past is that a few members of the CLA RC would come over to the Agency to meet with you to discuss topics of interest. This has traditionally been just a small, informal working session where we identify key issues and how we may be able to move the items forward. Topics that we would like to cover include:

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- Timing of first aid clarification memo
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?

We would like the opportunity to open the discussion with you and look forward to working with you. Please let me know if you have items that you would like to add to the list, we'd be happy to add them.
Our members will be in town on February 21, so if you have an hour on the 22nd, a few of us could plan to come over to the Agency to meet with you.

Will that work? If not, we can work to find the next available time.

Thank you,

Bob Hamilton

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Thursday, April 14, 2016 7:21 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra; Lewis, Susan; BCSReg_Archive
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

OK, sounds good. See you at 1:30.

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Thursday, April 14, 2016 6:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – After polling our member companies, we have added a few topics to the list so I wanted to forward it to you in advance of the meeting (below). It is possible we won't be able to cover every topic within the 1 hour slot (1:30 – 2:30) so we may need further discussions.

- Next printing/Released for Shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions
- Tolerance petition section F crop groups versus labeling with crop groups/processed commodities
- Placement of first aid statement – 40 CFR 156.10
- Database of conditional registration data submitted to Agency available to the public?
- We have received info that the Agency is rotating reviewers within team every 3 months – further clarification?

Currently, participants from our side will be: Ray McAllister, Bob Hamilton, Jack Cain and me. Thanks for your willingness to meet with us.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
Building
51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:59 AM

To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

At the most 4 – 5 folks from our side.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
Building
51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Friday, April 08, 2016 8:54 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com); Jack.Cain@dupont.com; BCSReg_Archive; Rate, Debra; Lewis, Susan
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Let me check and get back to you. How many people from your side would be attending?

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>
Subject: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – as a follow-up to previous discussions with CLA members, we would like to visit with you at your convenience and get further clarification and/or guidance on the following topics:

- Next printing/released for shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions

Several of the members will be in town next week attending the CLA Spring Conference so we would propose meeting either Wed or Thurs (4/13 or 4/14) for approximately 1 hr during 10:00 to 11:30 AM or 1:00 – 4:00 PM. Would you be available during any of those times?

Thanks in advance!

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
Building
51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

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Delivery Report

From: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
Sent: 1/14/2016 4:16:08 PM
To: Groce, Stacey [Groce.Stacey@epa.gov]
Subject: Read: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Your message
To: KIRK, ANNETTE M [AG/1000]

was read on 1/14/2016 4:16:08 PM

Your message

To:
Subject: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)
Sent: Thursday, January 14, 2016 4:16:20 PM (UTC) Monrovia, Reykjavik

was read on Thursday, January 14, 2016 4:16:08 PM (UTC) Monrovia, Reykjavik.

Message

From: Rate, Debra [Rate.Debra@epa.gov]
Sent: 1/14/2016 6:01:28 PM
To: Groce, Stacey [Groce.Stacey@epa.gov]
Subject: RE: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Sounds good.

From: Groce, Stacey
Sent: Thursday, January 14, 2016 1:01 PM
To: Rate, Debra <Rate.Debra@epa.gov>
Subject: FW: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Debra,

Ok .. finally the revised labels. We can do a resubmission tomorrow!

From: Stubbs Debbie USGR [mailto:debbie.stubbs@syngenta.com]
Sent: Thursday, January 14, 2016 12:58 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: FW: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

I received your email this morning regarding these 2 SLN labels that were revised and sent back to you on December 9. I apologize if this email was not received.

Please let me know if you have further questions or additional needs in regards to these SLNs.

Thanks,

Debbie

Debbie Stubbs
Senior Regulatory Manager- Regulatory Affairs Dept - State Affairs Team

410 Swing Road
Greensboro, NC 27409
phone +1 336-632-2449

debbie.stubbs@syngenta.com
www.syngenta.com

From: Stubbs Debbie USGR
Sent: Wednesday, December 09, 2015 2:52 PM
To: groce.stacey@epa.gov
Cc: Inouye, John@CDPR (John.Inouye@cdpr.ca.gov)
Subject: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

Sorry for the delay in getting the 2 SLN labels revised to remove the reference to "supplemental labeling". I replaced each occurrence (3 locations in each label I believe) with "Sec 24(c) label". Per our internal policy, I have changed the label code at the bottom of the last page for each label, which is also the file name for each attached pdf. Those are the only changes that I made other than deleting a few blank lines to improve the visual flow.

Please let me know if you have additional questions or revisions needed.

Regards,

Debbie

Debbie Stubbs
Senior Regulatory Manager - Regulatory Affairs Dept - State Affairs Team

Syngenta
410 Swing Road
Greensboro, NC 27409

phone +1 336-632-2449
debbie.stubbs@syngenta.com

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Message

From: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
Sent: 1/15/2016 9:32:11 PM
To: Groce, Stacey [Groce.Stacey@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]
CC: bruce.jacobson@state.sd.us; SCHMIDT, THOMAS MARK [AG/1000] [thomas.mark.schmidt@monsanto.com]; NYANGULU, JAMES M [AG/1920] [james.m.nyangulu@monsanto.com]
Subject: Voluntary Cancellation of Warrant Herbicide (acetochlor) Special Local Need Registration - SD130006
Attachments: 000524-00591.20160115.WarrantHerbicideVoluntaryCancellationAerial-SLN-SD.pdf

Stacey, Debra,

Please find attached a copy of my letter requesting to voluntarily cancel the South Dakota SLN SD130006 which allowed for aerial applications of Warrant Herbicide (EPA Reg. No. 524-591) in the state.

Instructions for aerial applications were included in the master labeling for this registration approved by EPA in June 2014, thus the SD SLN is no longer needed.

A hard-copy of the cancellation request will be submitted to EPA early next week.

I hope this meets your needs to proceed with the official cancellation and publication in the Federal Register.

If you need anything else, please let me know.

Best regards and have a great weekend!

Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

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Treasury, Office of Foreign Asset Controls (OFAC). As a recipient of this information you are obligated to comply with all
applicable U.S. export laws and regulations.

Message

From: Zavala, Miguel A. [Zavala.Miguel@epa.gov]
Sent: 1/29/2016 4:02:06 PM
To: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
CC: Groce, Stacey [Groce.Stacey@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]; NYANGULU, JAMES M [AG/1920] [james.m.nyangulu@monsanto.com]
Subject: RE: Letters needed for SLN cancellation requests -

Thank you very much for this update. Take care.

Miguel Zavala
Chemical Review Manager
PRD-RMIB Branch 3
703-347-0504 (o)
Personal Phone / Ex. 6 (c)
U.S. Environmental Protection Agency
Potomac Yard South, Arlington VA, 22202

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Friday, January 29, 2016 10:59 AM
To: Zavala, Miguel A. <Zavala.Miguel@epa.gov>
Cc: Groce, Stacey <Groce.Stacey@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; NYANGULU, JAMES M [AG/1920] <james.m.nyangulu@monsanto.com>
Subject: RE: Letters needed for SLN cancellation requests -

Dear Miguel,

I appreciate you reaching out to us on the voluntary cancellation of these SLN registrations.

Those listed below plus an additional SLN for South Dakota (SD130006) have all already been processed. We worked through Stacey Groce and Debra Rate who I have copied on this reply.

The appropriate representative from each State lead agency was notified and each agreed to the cancellation in their respective state.

The FR notice with the final cancellation order was just published last week (see attached) and all the SLNs below plus SD130006 are included there.

If you have any questions, Stacey or Debra should be able to help, or feel free to contact me.

Regards,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Zavala, Miguel A. [mailto:Zavala.Miguel@epa.gov]
Sent: Friday, January 29, 2016 8:43 AM
To: KIRK, ANNETTE M [AG/1000]; NYANGULU, JAMES M [AG/1920]
Subject: Letters needed for SLN cancellation requests

Good morning,

I am the chemical review manager at U.S. EPA responsible for processing special local need voluntary cancellation requests. I have run across your letter dated April 16, 2015 which lists the following SLN's to be cancelled:

- AR140002
- LA140001
- MS140001
- MO140005
- MO140006
- TX140003

When I received this letter attached was the letter from the Missouri Department of Agriculture requesting the cancellations for M0140005 and MO140006. To process the rest of the SLN cancellations, I will need letters from the other states. Please send them to me as soon as practical. Let me know if you have any other questions. Take care.

Miguel Zavala
Chemical Review Manager
PRD-RMIB Branch 3
703-347-0504 (o)
Personal Phone / Ex. 6 (C)
U.S. Environmental Protection Agency
Potomac Yard South, Arlington VA, 22202

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Message

From: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
Sent: 1/29/2016 3:58:32 PM
To: Zavala, Miguel A. [Zavala.Miguel@epa.gov]
CC: Groce, Stacey [Groce.Stacey@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]; NYANGULU, JAMES M [AG/1920] [james.m.nyangulu@monsanto.com]
Subject: RE: Letters needed for SLN cancellation requests -
Attachments: 2016-01310.pdf

Dear Miguel,

I appreciate you reaching out to us on the voluntary cancellation of these SLN registrations.

Those listed below plus an additional SLN for South Dakota (SD130006) have all already been processed. We worked through Stacey Groce and Debra Rate who I have copied on this reply.

The appropriate representative from each State lead agency was notified and each agreed to the cancellation in their respective state.

The FR notice with the final cancellation order was just published last week (see attached) and all the SLNs below plus SD130006 are included there.

If you have any questions, Stacey or Debra should be able to help, or feel free to contact me.

Regards,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Zavala, Miguel A. [mailto:Zavala.Miguel@epa.gov]
Sent: Friday, January 29, 2016 8:43 AM
To: KIRK, ANNETTE M [AG/1000]; NYANGULU, JAMES M [AG/1920]
Subject: Letters needed for SLN cancellation requests

Good morning,

I am the chemical review manager at U.S. EPA responsible for processing special local need voluntary cancellation requests. I have run across your letter dated April 16, 2015 which lists the following SLN's to be cancelled:

- AR140002
- LA140001
- MS140001
- MO140005
- MO140006
- TX140003

When I received this letter attached was the letter from the Missouri Department of Agriculture requesting the cancellations for M0140005 and MO140006. To process the rest of the SLN cancellations, I will need letters from the other states. Please send them to me as soon as practical. Let me know if you have any other questions. Take care.

Miguel Zavala
Chemical Review Manager
PRD-RMIB Branch 3
703-347-0504 (o)
Personal Phone / Ex. 6 (c)
U.S. Environmental Protection Agency
Potomac Yard South, Arlington VA, 22202

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Treasury, Office of Foreign Asset Controls (OFAC). As a recipient of this information you are obligated to comply with all
applicable U.S. export laws and regulations.

Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 1/14/2016 5:59:50 PM
To: Stubbs Debbie USGR [debbie.stubbs@syngenta.com]
Subject: RE: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Thanks so much!

From: Stubbs Debbie USGR [mailto:debbie.stubbs@syngenta.com]
Sent: Thursday, January 14, 2016 12:58 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: FW: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

I received your email this morning regarding these 2 SLN labels that were revised and sent back to you on December 9. I apologize if this email was not received.

Please let me know if you have further questions or additional needs in regards to these SLNs.

Thanks,

Debbie

Debbie Stubbs
Senior Regulatory Manager- Regulatory Affairs Dept - State Affairs Team

410 Swing Road
Greensboro, NC 27409
phone +1 336-632-2449

debbie.stubbs@syngenta.com
www.syngenta.com

From: Stubbs Debbie USGR
Sent: Wednesday, December 09, 2015 2:52 PM
To: groce.stacey@epa.gov
Cc: Inouye, John@CDPR (John.Inouye@cdpr.ca.gov)
Subject: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

Sorry for the delay in getting the 2 SLN labels revised to remove the reference to "supplemental labeling". I replaced each occurrence (3 locations in each label I believe) with "Sec 24(c) label". Per our internal policy, I have changed the label code at the bottom of the last page for each label, which is also the file name for each attached pdf. Those are the only changes that I made other than deleting a few blank lines to improve the visual flow.

Please let me know if you have additional questions or revisions needed.

Regards,

Debbie

Debbie Stubbs
Senior Regulatory Manager - Regulatory Affairs Dept - State Affairs Team

Syngenta
410 Swing Road
Greensboro, NC 27409

phone +1 336-632-2449
debbie.stubbs@syngenta.com

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Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 1/14/2016 4:12:15 PM
To: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
CC: Rate, Debra [Rate.Debra@epa.gov]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Hi Annette,

I am following-up with you regarding the SD130006 SLN referenced above. If you can email a separate letter for this SLN, I can complete the administrative processes needed to get it officially cancelled and published in the Federal Register.

Thanks,

Stacey

From: Groce, Stacey
Sent: Monday, December 07, 2015 10:03 AM
To: 'KIRK, ANNETTE M [AG/1000]' <annette.m.kirk@monsanto.com>
Subject: FW: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Hi Annette,

Here is the letter I referenced in my VM earlier.

At your earliest convenience, please send a separate voluntary cancellation letter for the aerial use pattern (various crops) for SD130006.

Thank you,

Stacey

From: Groce, Stacey
Sent: Wednesday, April 15, 2015 2:54 PM
To: KIRK, ANNETTE M [AG/1000] <annette.m.kirk@monsanto.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Annette,

Thank you very much. Please send the cancellation order through the document processing center. I will make sure there is no duplication.

Sincerely,

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Wednesday, April 15, 2015 2:42 PM
To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Thanks, Stacey. And by the way, coincidentally, I just received a copy of the attached notice today. So I must have circled 'CAN' (cancel) for these SLNs on Monsanto's FY2015 FIFRA Maintenance Fee schedule. Given this, do I still need to send the voluntary cancellation letter? It's not a problem to send it in, I have it ready to go, I just didn't want to cause confusion or to duplicate efforts for anyone there at the Agency.

Annette

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Wednesday, April 15, 2015 1:23 PM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Yes .. thank you Annette! I have that one too! I accidently left it off my list.

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Wednesday, April 15, 2015 2:21 PM
To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Stacey,

I'm showing an additional aerial SLN approved in Louisiana – LA140001. Unless there is a reason not to, I will add this one to the voluntary cancellation letter as well.

Thanks
Annette

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Wednesday, April 15, 2015 5:19 AM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Annette,

All five SLNs are for the same (acetochlor) federal registration: 524-591. One letter that addresses all five SLNs is fine but please add the state registration numbers in the subject line: AR140002, MO140005, MO140006, MS140001, TX140003. In addition, please copy each of the state contacts on the letter.

Thanks so much and please call or email if you have any questions.

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Tuesday, April 14, 2015 6:11 PM

To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hello Stacey,

I sincerely apologize for this slipping through the cracks on my desk! I will get the cancellation letter emailed to you by the end of this week.

I'm assuming that since all 5 of these SLNs were for the same federal registration that one letter addressing cancellation of all of them will suffice?

Thanks,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Monday, April 13, 2015 2:15 PM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Annette,

I am following-up with you regarding the status of the 5 voluntary cancellation letters for the acetochlor SLNS listed below. At your earliest convenience, please provide a status as to when you believe the letters will be emailed to me. I appreciate your assisting me in closing-out these actions.

Thanks,

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Thursday, February 26, 2015 3:37 PM
To: Groce, Stacey; LEMON, MARTIN D [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hello Stacey,

I will prepare the voluntary cancellation letter for the SLNs listed below and will get that sent in, in the next couple of weeks.

Is that timing acceptable?

Regards,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 26, 2015 11:54 AM
To: LEMON, MARTIN D [AG/1000]
Subject: FW: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Martin,

I am just checking to see what the status is of the SLNs listed below.

Thanks,

Stacey

From: Groce, Stacey
Sent: Tuesday, December 02, 2014 12:10 PM
To: 'martin.d.lemon@monsanto.com'
Cc: Groce, Stacey
Subject: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Martin,

I am following-up with you regarding our discussion about the24 (C) voluntary cancellation process. These are the five SLNs I have been assigned and that are no longer needed by the States referenced below:

1. **AR140002**
2. **MO140005**
3. **MO140006**
4. **MS140001**
5. **TX140003**

If you have any questions or if I have omitted any acetochlor SLNs, please call or send an email. Further, please send your voluntary cancellation letter via email and U.S. mail to the attention of:

Ms. Tawanda Maignan, Team Leader
Emergency Response Team
USEPA Office of Pesticide Programs
Document Processing Desk (SLN)
Room S4900

One Potomac Yard
2777 Crystal Drive
Arlington, Virginia 22202

*please note this address is different from the one I gave you earlier! You can also copy me via email on the letter (Subject): **Request for Voluntary Cancellation of FIFRA 24 C Special Local Need Registrations: AR140002, MO140005, MO140006, MS140001 and TX140003**

(1) Please state in the letter that you are the State Regulatory Lead and are authorized to request voluntary cancellations for the above referenced state registrations
(2) Monsanto does not wish to support the state registrations for use of aerial application of acetochlor on rice and soybeans and reason why
(3) In making this voluntary cancellation request, Monsanto expressly waives the 180-day comment period provided under FIFRA section 6(f)(1)(C). Accordingly, EPA will provide a 30-day comment period.

Thank you for assisting me in closing out the above referenced actions.

Sincerely,

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

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Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 1/14/2016 4:02:23 PM
To: Stubbs Debbie USGR [debbie.stubbs@syngenta.com]
CC: Rate, Debra [Rate.Debra@epa.gov]
Subject: CA-060019 (Swiss Chard) & CA-080019 (Celery) - Follow-up Action Needed

Hi Debbie,

I am following-up with you regarding the Dual Magnum SLNs for CA. Please let me know at your earliest convenience, if you plan to send them to me via email so that I can complete these actions ASAP.

Thanks so much!

Stacey

From: Groce, Stacey
Sent: Tuesday, December 08, 2015 12:16 PM
To: 'Stubbs Debbie USGR' <debbie.stubbs@syngenta.com>
Subject: RE: Dual Magnum SLNs for CA - will provide them tomorrow

Thanks! I look forward to receiving the revised CA SLN labels tomorrow morning.

Stacey

From: Stubbs Debbie USGR [mailto:debbie.stubbs@syngenta.com]
Sent: Tuesday, December 08, 2015 11:31 AM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: Dual Magnum SLNs for CA - will provide them tomorrow

Hi Stacey,

I received your voicemail and I understand the changes that you want on the 2 SLNs for CA. I am out of the office this afternoon, leaving in just a few minutes, but I will get these corrected and send to you via email tomorrow morning.

I just wanted to let you that this will be addressed tomorrow.

Regards,

Debbie

Debbie Stubbs
Senior Regulatory Manager - Regulatory Affairs Dept - State Affairs Team

Syngenta
410 Swing Road
Greensboro, NC 27409

phone +1 336-632-2449
debbie.stubbs@syngenta.com

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Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 1/14/2016 6:00:42 PM
To: Rate, Debra [Rate.Debra@epa.gov]
Subject: FW: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)
Attachments: removed.txt; CA0816091CA1215.pdf; CA0816112CA1215.pdf

Debra,

Ok .. finally the revised labels. We can do a resubmission tomorrow!

From: Stubbs Debbie USGR [mailto:debbie.stubbs@syngenta.com]
Sent: Thursday, January 14, 2016 12:58 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: FW: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

I received your email this morning regarding these 2 SLN labels that were revised and sent back to you on December 9. I apologize if this email was not received.

Please let me know if you have further questions or additional needs in regards to these SLNs.

Thanks,

Debbie

Debbie Stubbs
Senior Regulatory Manager- Regulatory Affairs Dept - State Affairs Team

410 Swing Road
Greensboro, NC 27409
phone +1 336-632-2449

debbie.stubbs@syngenta.com
www.syngenta.com

From: Stubbs Debbie USGR
Sent: Wednesday, December 09, 2015 2:52 PM
To: groce.stacey@epa.gov
Cc: Inouye, John@CDPR (John.Inouye@cdpr.ca.gov)
Subject: Dual Magnum - Revised SLN language as requested by USEPA - CA-060019 (Swiss Chard) & CA-080019 (Celery)

Hi Stacey,

Sorry for the delay in getting the 2 SLN labels revised to remove the reference to "supplemental labeling". I replaced each occurrence (3 locations in each label I believe) with "Sec 24(c) label". Per our internal policy, I have changed the label code at the bottom of the last page for each label, which is also the file name for each attached pdf. Those are the only changes that I made other than deleting a few blank lines to improve the visual flow.

Please let me know if you have additional questions or revisions needed.

Regards,

Debbie

Debbie Stubbs
Senior Regulatory Manager - Regulatory Affairs Dept - State Affairs Team

Syngenta
410 Swing Road
Greensboro, NC 27409

phone +1 336-632-2449
debbie.stubbs@syngenta.com

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Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 2/11/2016 8:00:32 PM
To: Judy H Fersch [judy.fersch@basf.com]
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Thank you so much Judy! Have a great afternoon!

Stacey

From: Judy H Fersch [mailto:judy.fersch@basf.com]
Sent: Thursday, February 11, 2016 2:58 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Hey Stacey,

I've attached the letter for you, check and make sure it's what you need – I'll be happy to change if you need me to !

Take Care,

Judy

Judy Fersch
State Registration Manager

Phone: 919 547-2258 Mobile: 919-358-4973 Fax: 919 547-2880 E-Mail: judy.fersch@basf.com
Postal Address: BASF Corporation, Research Triangle Park, 27709 Research Triangle Park, USA

150 years
BASF - We create chemistry

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 11, 2016 12:17 PM
To: Judy H Fersch <judy.fersch@basf.com>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Thank you Judy .. very much appreciated!!

Stacey

From: Judy H Fersch [mailto:judy.fersch@basf.com]
Sent: Thursday, February 11, 2016 12:10 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: RE: Voluntary Cancellation of Topramezone - SLN NC-150006

Hey Stacey,

I will get you a letter by tomorrow afternoon, hopefully even this afternoon !

Thanks for the email,

Take Care,

Judy

Judy Fersch
State Registration Manager

Phone: 919 547-2258 Mobile: 919-358-4973 Fax: 919 547-2880 E-Mail: judy.fersch@basf.com
Postal Address: BASF Corporation, Research Triangle Park, 27709 Research Triangle Park, USA

150 years
BASF - We create chemistry

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 11, 2016 11:16 AM
To: Judy H Fersch <judy.fersch@basf.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Voluntary Cancellation of Topramezone - SLN NC-150006

Hi Judy,

To formally close-out this withdrawn action, please email a voluntary cancellation letter in order to begin the administrative process, which concludes with a publication in the Federal Register.

It is my understanding based on an e-mail from Lee Davis of the North Carolina Department of Agriculture that BASF has withdrawn SLN NC150006. Please let me know at your earliest convenience if BASF as the regulatory lead, no longer supports this state registration and discuss the rationale for cancellation.

Also, let me know if, in making this voluntary cancellation request, BASF expressly waives the 180-day comment period provided under **FIFRA section 6(f)(1)(C)**. Accordingly, EPA will provide a 30-day comment period.

Thank you and call or email if you have any questions.

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 1/15/2016 5:48:23 PM
To: KIRK, ANNETTE M [AG/1000] [annette.m.kirk@monsanto.com]
CC: Rate, Debra [Rate.Debra@epa.gov]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Hi Annette!

Thank you so much. Please address the letter to:

Debra Rate, Ph.D., Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division (7505P)
Office of Pesticide Programs

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Friday, January 15, 2016 12:43 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Rate, Debra <Rate.Debra@epa.gov>
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)
Importance: High

Hi Stacey,

I apologize for the delay on this.

I'll get the separate letter drafted and sent out today. Should I address it to you or to Tawanda, or who?

Thanks
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, January 14, 2016 10:12 AM
To: KIRK, ANNETTE M [AG/1000]
Cc: Rate, Debra
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Hi Annette,

I am following-up with you regarding the SD130006 SLN referenced above. If you can email a separate letter for this SLN, I can complete the administrative processes needed to get it officially cancelled and published in the Federal Register.

Thanks,

Stacey

From: Groce, Stacey
Sent: Monday, December 07, 2015 10:03 AM
To: 'KIRK, ANNETTE M [AG/1000]' <annette.m.kirk@monsanto.com>
Subject: FW: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registration (SD130006 Monsanto 63410 Herbicide)

Hi Annette,

Here is the letter I referenced in my VM earlier.

At your earliest convenience, please send a separate voluntary cancellation letter for the aerial use pattern (various crops) for SD130006.

Thank you,

Stacey

From: Groce, Stacey
Sent: Wednesday, April 15, 2015 2:54 PM
To: KIRK, ANNETTE M [AG/1000] <annette.m.kirk@monsanto.com>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Annette,

Thank you very much. Please send the cancellation order through the document processing center. I will make sure there is no duplication.

Sincerely,

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Wednesday, April 15, 2015 2:42 PM
To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Thanks, Stacey. And by the way, coincidentally, I just received a copy of the attached notice today. So I must have circled 'CAN' (cancel) for these SLNs on Monsanto's FY2015 FIFRA Maintenance Fee schedule. Given this, do I still need to send the voluntary cancellation letter? It's not a problem to send it in, I have it ready to go, I just didn't want to cause confusion or to duplicate efforts for anyone there at the Agency.

Annette

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Wednesday, April 15, 2015 1:23 PM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Yes .. thank you Annette! I have that one too! I accidently left it off my list.

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Wednesday, April 15, 2015 2:21 PM
To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Stacey,

I'm showing an additional aerial SLN approved in Louisiana – LA140001. Unless there is a reason not to, I will add this one to the voluntary cancellation letter as well.

Thanks
Annette

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Wednesday, April 15, 2015 5:19 AM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Annette,

All five SLNs are for the same (acetochlor) federal registration: 524-591. One letter that addresses all five SLNs is fine but please add the state registration numbers in the subject line: AR140002, MO140005, MO140006, MS140001, TX140003. In addition, please copy each of the state contacts on the letter.

Thanks so much and please call or email if you have any questions.

Stacey

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Tuesday, April 14, 2015 6:11 PM
To: Groce, Stacey
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hello Stacey,

I sincerely apologize for this slipping through the cracks on my desk! I will get the cancellation letter emailed to you by the end of this week.

I'm assuming that since all 5 of these SLNs were for the same federal registration that one letter addressing cancellation of all of them will suffice?

Thanks,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167
(314) 694-8890

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Monday, April 13, 2015 2:15 PM
To: KIRK, ANNETTE M [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Annette,

I am following-up with you regarding the status of the 5 voluntary cancellation letters for the acetochlor SLNS listed below. At your earliest convenience, please provide a status as to when you believe the letters will be emailed to me. I appreciate your assisting me in closing-out these actions.

Thanks,

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

From: KIRK, ANNETTE M [AG/1000] [mailto:annette.m.kirk@monsanto.com]
Sent: Thursday, February 26, 2015 3:37 PM
To: Groce, Stacey; LEMON, MARTIN D [AG/1000]
Subject: RE: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hello Stacey,

I will prepare the voluntary cancellation letter for the SLNs listed below and will get that sent in, in the next couple of weeks.

Is that timing acceptable?

Regards,
Annette

Annette M. Kirk
Regulatory Affairs Manager, Selective Herbicides
Global Chemistry & Seed Regulatory Affairs
Monsanto Company
800 N. Lindbergh Blvd
St. Louis, Missouri 63167

(314) 694-8890

From: Groce, Stacey [mailto:Groce.Stacey@epa.gov]
Sent: Thursday, February 26, 2015 11:54 AM
To: LEMON, MARTIN D [AG/1000]
Subject: FW: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Martin,

I am just checking to see what the status is of the SLNs listed below.

Thanks,

Stacey

From: Groce, Stacey
Sent: Tuesday, December 02, 2014 12:10 PM
To: 'martin.d.lemon@monsanto.com'
Cc: Groce, Stacey
Subject: Voluntary Cancellation of Acetochlor 24 (c) Special Local Need Registrations

Hi Martin,

I am following-up with you regarding our discussion about the24 (C) voluntary cancellation process. These are the five SLNs I have been assigned and that are no longer needed by the States referenced below:

1. **AR140002**
2. **MO140005**
3. **MO140006**
4. **MS140001**
5. **TX140003**

If you have any questions or if I have omitted any acetochlor SLNs, please call or send an email. Further, please send your voluntary cancellation letter via email and U.S. mail to the attention of:

Ms. Tawanda Maignan, Team Leader
Emergency Response Team
USEPA Office of Pesticide Programs
Document Processing Desk (SLN)
Room S4900
One Potomac Yard
2777 Crystal Drive
Arlington, Virginia 22202

*please note this address is different from the one I gave you earlier! You can also copy me via email on the letter (Subject): **Request for Voluntary Cancellation of FIFRA 24 C Special Local Need Registrations: AR140002, MO140005, MO140006, MS140001 and TX140003**

(1) Please state in the letter that you are the State Regulatory Lead and are authorized to request voluntary cancellations for the above referenced state registrations
(2) Monsanto does not wish to support the state registrations for use of aerial application of acetochlor on rice and soybeans and reason why

(3) In making this voluntary cancellation request, Monsanto expressly waives the 180-day comment period provided under FIFRA section 6(f)(1)(C). Accordingly, EPA will provide a 30-day comment period.

Thank you for assisting me in closing out the above referenced actions.

Sincerely,

Stacey

Stacey Milan Groce
USEPA Office of Pesticide Programs
Risk Integration, Minor Use, & Emergency Response Branch
One Potomac Yard (7505P)
2777 S. Crystal Drive
Arlington, VA 22202
(703) 305-2505

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applicable U.S. export laws and regulations.

Message

From: Lowman, Alan [Alan.Lowman@agr.georgia.gov]
Sent: 3/30/2018 6:36:32 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: kshears@dow.com; Alton N Sparks [asparks@uga.edu]; Gray, Thomas [Thomas.Gray@agr.georgia.gov]
Subject: 24c for Dow AgroSciences Lorsban Advanced SLN: GA-180001
Attachments: Dow AgroSciences Lorsban Advanced Support Letter for 24c 180330.pdf; UPS Ship Notification, Tracking Number 1Z3234820197565647; UPS Ship Notification, Tracking Number 1Z3234820191818198

Importance: High

Good afternoon, Tawanda and Stacey.

This letter is to notify you of The Georgia Department of Agriculture – Pesticide Program's decision to approve the application for 24(c) special local need registration for Dow AgroSciences Lorsban Advanced, EPA Reg. #62719-591. This approval is supported by Dr. Alton N. Sparks, Jr. of The University of Georgia. Similar SLNs have been approved in Arkansas, Louisiana, Mississippi, and North Carolina.

In recent year, wireworms and flea beetles have been problematic for sweet potato producers. These soil insects can cause economic loss reducing both yield and quality, and can be hard to control. Since, they dwell below the soil. Lorsban Advanced will provide the necessary level of control for producers to protect their crop within current sweet potato production practices.

In this request you will find the following items:

1. Dow AgroSciences support letter.
2. EPA Form 8570-25.
3. 2 copies of the Section 24 (c) label for Lorsban Advanced.
4. Section 3 approved label for the product Lorsban Advanced, EPA Reg. #62719-519.
5. Copy of 40 CFR 180.419 showing a tolerance for chlorpyrifos on sweet potatoes.
6. Efficacy data (2 copies).
7. Letter of support from Dr. Alton N. Sparks, Jr. of The University of Georgia.

We trust that you find our approval in order. We will forward revised 24c labels from Dow AgroSciences to you as soon as possible. If we can provide additional information, please let us know.

Hard copies of the attached package are coming to each of you via UPS Next Day. Please see the attached UPS shipment notifications for more details.

Regards,
Alan

Alan Lowman
Ag Inputs Section Program Director

Georgia Department of Agriculture
19 Martin Luther King Jr Dr SW, Room 410
Atlanta, GA 30334-4201
Office: 404-656-4958
Fax: 404-657-8378
http://www.agr.georgia.gov/agricultural-inputs.aspx

Message

From: Jack Peterson [jpeterson@azda.gov]
Sent: 4/25/2018 1:46:19 PM
To: Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum
Attachments: Section 18 for sorghum - LOS from DAS - 2018 renewal.pdf; R396-207 Transform WG Sec 18 AZ Sorghum 24April18d.pdf

Here is the letter of support and label for the sorghum section 18.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 24, 2018 8:44 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: RE: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Thank you for the documents. I see you've already copied Stacey and Tamica – much appreciated since they are coordinating the next steps involved with these requests at our end.

We'll let you know if we have any questions.

Sincere regards, Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 24, 2018 11:31 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Peter Ellsworth <peterell@ag.arizona.edu>; blbret@dow.com; 'Mostafa, Ayman M - (ayman)' <ayman@cals.arizona.edu>
Subject: 2018 Applications for Specific Exemptions - Cotton and Sorghum

Attached you will find the streamlined applications for the allowance of two Arizona Specific Exemptions for the use of Transform WG – EPA Reg # 62719-625.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 7:19 AM
To: Jack Peterson <jpeterson@azda.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Thanks for the explanation – we'll use the ones you've e-mailed yesterday since you indicated that there were also some errors that were corrected.

For Section 18s, the electronic (e-mailed) versions are sufficient for us. At this time, SLN (24(c)) documents still just ***only*** be mailed in paper form to the OPP Front desk for appropriate in-processing to begin.

Regards, Nik

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Tuesday, April 17, 2018 10:06 AM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: RE: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

That is so weird as the packages we mailed in were returned to us. Therefore, we sent them again yesterday and I emailed them to you. There were some math errors in the first ones so one part was changed - 166.32(b)(1) in both packages. The other ones I emailed in were not acknowledged so I believed the only ones that count are the ones that we mail in – which unfortunately were returned due to a bad address.

Thank you for your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 17, 2018 6:59 AM
To: Cain, Tamica <Cain.Tamica@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Jack Peterson <jpeterson@azda.gov>

Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Hello Jack –

I'm just writing to acknowledge receipt of your documents, and to let you know that I am copying our team members Stacey Groce (who has been reviewing documents supporting sulfoxaflor exemptions for sorghum) and Tamica Cain (who has the same responsibility for sulfoxaflor in cotton).

Based on my discussion today with Stacey, it seems that the documents you have sent look virtually identical to ones that we received around March 27. Have there been any changes that we should focus on in the attached versions that you sent yesterday?

Thank you - Nik

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

From: Jack Peterson [mailto:jpeterson@azda.gov]
Sent: Monday, April 16, 2018 3:57 PM
To: Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>
Subject: Going out in the mail today. - Section 18 Final Reports 17AZ01 and 17AZ02

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Jack Peterson
Sent: Tuesday, April 10, 2018 8:14 AM
To: 'Mallampalli, Nikhil' <Mallampalli.Nikhil@epa.gov>
Subject: RE: SLNs

Thank you. I had looked at that page but only the stuff on the top left and didn't scroll down. Sorry about that, but I really appreciate your help.

Jack Peterson
Associate Director, ESD
Arizona Department of Agriculture
1688 W Adams Street
Phoenix, AZ 85007
602-542-3575

From: Mallampalli, Nikhil [mailto:Mallampalli.Nikhil@epa.gov]
Sent: Tuesday, April 10, 2018 4:32 AM
To: Jack Peterson <jpeterson@azda.gov>
Cc: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: Re: SLNs

Dear Mr. Peterson –

My name is Nikhil (Nik) Mallampalli and I have recently taken over temporarily from Tawanda as the team lead for the group that handles emergency exemptions (Section 18s) and SLNs. She forwarded to me your message asking for the mailing addresses to mail state Special Local Needs labels and supporting documentations to. These addresses are available as part of the information that you can find at the Section 24(c) URL below. I am also reproducing them as follows, for easier access:

*Address for FedEx, UPS, DHL, Courier deliveries **ONLY***

U.S. EPA Office of Pesticide Programs
Document Processing Desk (SLN)
U.S. Environmental Protection Agency
2777 Crystal Drive
Arlington, VA 22202

*Address for U.S. Postal Service deliveries **ONLY***
Document Processing Desk (SLN)
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

I hope this addresses your question sufficiently. If not, or if you have additional questions, please don't hesitate to contact me.

Thank you -

Nikhil Mallampalli
Acting Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division | U.S. EPA Office of Pesticide Programs
Tel: (703) 308-1924 | Mallampalli.nikhil@epa.gov
1200 Pennsylvania Avenue, NW | Washington, DC 20460

Section 24(c) URL: https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations
Section 18 URL: http://www.epa.gov/opprd001/section18/

Message

From: Lowman, Alan [Alan.Lowman@agr.georgia.gov]
Sent: 3/9/2018 2:30:56 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
CC: Groce, Stacey [Groce.Stacey@epa.gov]; jmmoore@uga.edu; Dinnen Pat USGR [pat.dinnen@syngenta.com]
Subject: Syngenta Ridomil Gold SL 24c cancellation letter
Attachments: GA_RidomilGoldSLTobacco_SLNCancelLtr_03-02-18.pdf; Syngenta Ridomil Gold SL 24c cancellation letter signed 180309.pdf

March 9, 2018

Tawanda Maignan
U.S. EPA Office of Pesticide Programs
Document Processing Desk (SLN)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA. 22202

RE: SLN GA-110002

Ms. Maignan,

This letter is to notify you of the Georgia Department of Agriculture – Pesticide Program's decision to immediately cancel the EPA SLN No. GA-110002 for Ridomil Gold SL, EPA Reg. No. 100-1202 for use in tobacco transplant water for the control of black shank. This use has been added to the Section 3 label by Syngenta Crop Protection, LLC.

If we can provide additional information, please let us know.

Sincerely,

Alan Lowman
Director, Ag Inputs Section

cc: J. Michael Moore
Pat Dinnen
Stacey Groce

Alan Lowman
Ag Inputs Section Program Director
Georgia Department of Agriculture
19 Martin Luther King Jr Dr SW, Room 410
Atlanta, GA 30334-4201
Office: 404-656-4958
Fax: 404-657-8378
http://www.agr.georgia.gov/agricultural-inputs.aspx

Message

From: Ben Miller [Ben.Miller@ISDA.IDAHO.GOV]
Sent: 4/19/2017 8:31:43 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]; Groce, Stacey [Groce.Stacey@epa.gov]
CC: Mary Fryczynski [mary.fryczynski@basf.com]; Hirnyck, Ronda (rhirnyck@uidaho.edu) [rhirnyck@uidaho.edu]; Roger Batt [Roger@amgidaho.com]; David Priebe (dpriebe@oda.state.or.us) [dpriebe@oda.state.or.us]; sfoss@agr.wa.gov; ejohansen@agr.wa.gov
Subject: Special Local Need (SLN) Registration 24(c) for Imazamox and Bentazon (Varisto Herbicide) EPA Reg. No. 241-447, for control of weeds in clover grown for seed in Idaho, manufactured by BASF, SLN #ID-170001.
Attachments: 20170419145021678.pdf; 20170419145031393.pdf

Hi Stacey and Tawanda,

Here is an approved Special Local Need (SLN) Registration 24(c) for Imazamox and Bentazon (Varisto Herbicide) EPA Reg. No. 241-447, for control of weeds in clover grown for seed in Idaho, manufactured by BASF, SLN #ID-170001.

Feel free to contact me if you have questions. The original packet will be sent in the mail.

Thanks,

Ben Miller
Idaho State Department of Agriculture
208-332-8593

Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 4/25/2017 3:23:36 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: Special Local Need (SLN) Registration 24(c) for Imazamox and Bentazon (Varisto Herbicide) EPA Reg. No. 241-447, for control of weeds in clover grown for seed in Idaho, manufactured by BASF, SLN #ID-170001.
Attachments: 20170419145021678.pdf; 20170419145031393.pdf

Tawanda .. I just spoke to Gretchen Pollack the Bureau Chief from IDA. Here are the 24c's from Ben Miller we discussed earlier. IDA will send them through the document processing center.

Stacey

-----Original Message-----
From: Ben Miller [mailto:Ben.Miller@ISDA.IDAHO.GOV]
Sent: Wednesday, April 19, 2017 4:32 PM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>
Cc: Mary Fryczynski <mary.fryczynski@basf.com>; Hirnyck, Ronda (rhirnyck@uidaho.edu) <rhirnyck@uidaho.edu>; Roger Batt <Roger@amgidaho.com>; David Priebe (dpriebe@oda.state.or.us) <dpriebe@oda.state.or.us>; sfoss@agr.wa.gov; ejohansen@agr.wa.gov
Subject: Special Local Need (SLN) Registration 24(c) for Imazamox and Bentazon (Varisto Herbicide) EPA Reg. No. 241-447, for control of weeds in clover grown for seed in Idaho, manufactured by BASF, SLN #ID-170001.

Hi Stacey and Tawanda,

Here is an approved Special Local Need (SLN) Registration 24(c) for Imazamox and Bentazon (Varisto Herbicide) EPA Reg. No. 241-447, for control of weeds in clover grown for seed in Idaho, manufactured by BASF, SLN #ID-170001.

Feel free to contact me if you have questions. The original packet will be sent in the mail.

Thanks,

Ben Miller
Idaho State Department of Agriculture
208-332-8593

Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 2/1/2017 11:26:11 AM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: XtendiMax 24c Label

No problem!

-----Original Message-----
From: Maignan, Tawanda
Sent: Tuesday, January 31, 2017 4:03 PM
To: Groce, Stacey <Groce.Stacey@epa.gov>
Subject: FW: XtendiMax 24c Label

Stacey -- I recently assigned this SLN to you and did not know we had in fact received the revised label. Disregard my note to you on this issue. Thanks.

-----Original Message-----
From: Gray, Thomas [mailto:Thomas.Gray@agr.georgia.gov]
Sent: Friday, January 20, 2017 9:28 AM
To: Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Cc: Andrews, Adrienne <Adrienne.Andrews@agr.georgia.gov>; Lowman, Alan <Alan.Lowman@agr.georgia.gov>
Subject: Fwd: XtendiMax 24c Label

Hi Tawanda!

Please see attached a revised 24c label for XtendiMax with VaporGrip that includes Georgia's information in the bottom right section of the label alongside of Monsanto's name.

I'll ask Adrienne Andrews in our office to send a copy through the documents record branch, as well.

Thanks!

Tommy Gray

Sent from my iPad

Begin forwarded message:

From: "BROWN, SHAZIA A [AG/1005]" <shazia.a.brown@monsanto.com<mailto:shazia.a.brown@monsanto.com>>
Date: January 19, 2017, 1:22:13 PM EST
To: "Gray, Thomas" <Thomas.Gray@agr.georgia.gov<mailto:Thomas.Gray@agr.georgia.gov>>
Cc: "SCHMIDT, THOMAS MARK [AG/1000]"
<thomas.mark.schmidt@monsanto.com<mailto:thomas.mark.schmidt@monsanto.com>>
Subject: RE: XtendiMax 24c Label

From: Maignan, Tawanda [mailto:Maignan.Tawanda@epa.gov]
Sent: Thursday, January 12, 2017 10:15 AM
To: Gray, Thomas
Subject: RE: Dicamba 24c Labels

Good morning Tommy,

Georgia’s information would go across from Monsanto’s as follows:

24(c) Registrant:
Georgia Department of Agriculture
19 Martin Luther King, Jr. Drive, Rm 429 Atlanta, GA 30334

Thanks,
Tawanda

Tawanda Maignan
Emergency Response Team Leader
Registration Division | Office of Pesticide Programs Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency (7505P)
1200 Pennsylvania Avenue, NW | Washington, DC 20460
Tel: (703) 308-8050 | Maignan.Tawanda@epa.gov<mailto:Maignan.Tawanda@epa.gov>

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Message

From: Groce, Stacey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE]
Sent: 11/14/2016 4:48:02 PM
To: Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: FW: SLN 150001 Withdrawal
Attachments: Rowel SLN Withdrawal.pdf; 24c and Sect 18 guidance.pdf

FYI!!

From: Olsen, Eric [mailto:Eric.Olsen@agr.georgia.gov]
Sent: Wednesday, August 19, 2015 9:42 AM
To: BROWN, SHAZIA A [AG/1000] (shazia.a.brown@monsanto.com) <shazia.a.brown@monsanto.com>
Cc: Groce, Stacey <Groce.Stacey@epa.gov>; Groce, Stacey <Groce.Stacey@epa.gov>; Lowman, Alan <Alan.Lowman@agr.georgia.gov>; Gray, Thomas <Thomas.Gray@agr.georgia.gov>; Rate, Debra <Rate.Debra@epa.gov>
Subject: SLN 150001 Withdrawal

Ms. Brown,
Attached to this e-mail you will find the withdrawal letter for SLN# GA150001. In addition, you will also find the EPA guidance document sent to GDA Plant Industry Division Director Tommy Gray from Dr. Debra Rate of EPA. Pay particular attention to page 11 of the document in the section titled "SLN Issuance and Distributor Products". If we can provide any additional information regarding this SLN withdrawal, please let us know.
Sincerely,

Eric Olsen
Pesticide Program Manager
Georgia Department of Agriculture
Agriculture Inputs Section
eric.olsen@agr.georgia.gov
Office (404) 656-4958

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Message

From: Hamilton, Robert [Bob.Hamilton@valent.com]
Sent: 10/20/2017 5:47:11 PM
To: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
CC: Kenny, Daniel [Kenny.Dan@epa.gov]; Jack.Cain@dupont.com; karen.cain@bayer.com; Timothy A Mahl [timothy.mahl@basf.com]; john.abbott@syngenta.com; Ray McAllister [rmcallister@croplifeamerica.org]
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?
Attachments: 2017-10-16 draft notes.docx

Hi Dan-

Thank you for a productive meeting, we enjoyed meeting with you and appreciate your openness in finding paths forward on the issues that we discussed. You'll see that Karen has already gotten in touch with Don Lott and we are scheduling him as a guest for our upcoming RC meeting. Thank you for your help and insight.

Attached are the bullet points that I wrote down from our meeting. Will you please review and give your comments?

Thanks again, I'll be in touch about setting up another discussion in a few months.

Best,

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, September 11, 2017 2:43 PM
To: Hamilton, Robert
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – ok. 1 pm and 4 pm are free for me on that day.

From: Hamilton, Robert [mailto:Bob.Hamilton@valent.com]
Sent: Monday, September 11, 2017 2:05 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com; Ray McAllister <rmcallister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, does the afternoon of October 16th work for you?

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Tuesday, August 29, 2017 5:20 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Bob – I'm slated to go to the IR-4 food use work shop which will be that day and that meeting is out of town.

So could we look at a different day to set the next discussion up?

From: Hamilton, Robert [mailto:Bob.Hamilton@valent.com]
Sent: Tuesday, August 29, 2017 1:14 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Cc: karen.cain@bayer.com; Ray McAllister <rmcallister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, would you be able to meet with us on the morning of Wednesday, September 20? We'll have folk in town and could come over to see you if that morning works for you. I won't be there, but Ray, Karen and other will.

Thank you, Have a great day.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Tuesday, July 11, 2017 2:20 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

No worries – Bob.

Just relay if you all would like a re-set for scheduling it later.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Tuesday, July 11, 2017 12:55 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, I have to give you the time back on your calendar on July 19th at 1pm, many of our participants (now, also including me) have conflicts. I'm sorry to set this up and then ask to reschedule. I'll get in touch with you to propose a different date, but for now, you have an extra hour on your calendar!

Thank you for understanding.

Back in touch soon.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Friday, June 23, 2017 4:20 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – good. See you all then.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Friday, June 23, 2017 4:06 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, Thanks for the note. We'd be happy to come over and see you. How about 1pm on the 19th? I'll follow up next week.

Have a great weekend.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Friday, June 23, 2017 4:01 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Bob – 7/19 is available. Right now – I'm free most of that day – with the exception of the morning. So any time after 11 am will work for me.

Are you all able to come here on that day, or what were you thinking regarding the venue?

Dan
703-308-9366

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Friday, June 23, 2017 9:43 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, I hope that you are having a good summer. Have you had a chance to check your calendar to see if you might have an hour to meet with CLA RC representatives on either July 17th or 19th? We look forward to talking with you soon.

Best regards,

Bob Hamilton

From: Hamilton, Robert
Sent: Wednesday, May 24, 2017 12:44 PM
To: 'Rosenblatt, Daniel'
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, it has been a few months since we last talked, I'm wondering if we can start to check calendars for another time to meet. Does July 19th for about an hour work for you? Our participants will be in town for the RC meeting on the 18th and we could ask for them to stay to meet with you. We have a couple of topics that we'd like to discuss with you. As we agreed last time, we'll write general minutes and have you approve them before anything is shared with membership.

I appreciate your time and look forward to seeing you again.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Wednesday, February 22, 2017 6:06 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Good deal thanks Bob. I thought it was a good discussion too.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Wednesday, February 22, 2017 5:09 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

Thank you for a good meeting, I appreciate your time, candor, and willingness to work with us.
I'm out for the next few days, but next week I'd like to call you to set up the next one and see if we can brainstorm a way to make these discussion even more productive and actionable for both of us!

Thanks again,

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Wednesday, February 15, 2017 9:18 AM
To: Hamilton, Robert
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sounds good.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Wednesday, February 15, 2017 9:12 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, our group will plan to come over on Wednesday 2/22 to meet with you at 2pm for an hour. We'll plan to arrive a few minutes early and I'll call you to let you know we're in the lobby, if that works for you. Let me know if you want to do it differently, or if you want me to call someone else to escort us to your floor.

Here is a list of the topics that we would like to discuss. We really appreciate the opportunity to informally meet with you.

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- First aid clarification memo next steps
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?
- Items that you would like to discuss with registrants.

Thank you very much, see you next week!

Best,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 5:21 PM
To: Hamilton, Robert
Cc: Ray McAllister (RMcAllister@croplifeamerica.org); Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sure. Something that's informal works too.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 3:15 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

I'm glad to know that the time still works for you, we'll plan on it.

Historically, this has just been an informal discussion between CLA RC leadership and the RD deputy on a few topics to get your perspective and feedback. We'd like to see if we can find common ground to move forward on items which we both have interest in progressing. No preparation necessary, nor firm commitments required on your part. We just would appreciate the opportunity to visit and get your perspective. We will work on refining the list of topics and I will send them to you in advance of the meeting.

Make sense?

Thank you for your willingness to meet with us.

Best regards,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 12:05 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob - Yes – our meeting on 2/22 is still clear for my calendar. It would be good though to refine the topic list soon so that as needed additional EPAers can be there to have a really productive discussion.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 11:22 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

We are still planning for February 22 at 2pm. Does that still work for you? As we get a little closer, I'll send you an updated topic list.

Thank you very much for agreeing to meet with us.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, November 21, 2016 5:29 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob – All – I missed coordinating today with others from EPA on this. (And I'm about to take some time away due to Thanksgiving). So just to get out an immediate answer – sure – I'd propose that you all come over to EPA's Arlington building at say 2 pm on 2/22/17 for this. Does that work? I have a meeting room we can use. But we can adjust that timing and the agenda as it gets closer.

Dan

Daniel J. Rosenblatt, Deputy Director
Registration Division, Office of Pesticide Programs
e-mail: rosenblatt.dan@epa.gov
Phone: (703) 308-9366
URL: www.epa.gov/pesticides

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, November 21, 2016 11:10 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

The CLA Registration Committee leadership has a standing tradition of informally meeting with an RD Deputy to discuss current topics of interest.
We have been meeting with Jeff, but now that he is in FEAD, we wonder if either you, or you and Jeff would be able to meet with us for an hour early in the new year. The way that this has worked in the past is that a few members of the CLA RC would come over to the Agency to meet with you to discuss topics of interest. This has traditionally been just a small, informal working session where we identify key issues and how we may be able to move the items forward. Topics that we would like to cover include:

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- Timing of first aid clarification memo
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?

We would like the opportunity to open the discussion with you and look forward to working with you. Please let me know if you have items that you would like to add to the list, we'd be happy to add them.
Our members will be in town on February 21, so if you have an hour on the 22nd, a few of us could plan to come over to the Agency to meet with you.

Will that work? If not, we can work to find the next available time.

Thank you,

Bob Hamilton

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Thursday, April 14, 2016 7:21 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra; Lewis, Susan; BCSReg_Archive
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

OK, sounds good. See you at 1:30.

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Thursday, April 14, 2016 6:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – After polling our member companies, we have added a few topics to the list so I wanted to forward it to you in advance of the meeting (below). It is possible we won't be able to cover every topic within the 1 hour slot (1:30 – 2:30) so we may need further discussions.

- Next printing/Released for Shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions
- Tolerance petition section F crop groups versus labeling with crop groups/processed commodities
- Placement of first aid statement – 40 CFR 156.10
- Database of conditional registration data submitted to Agency available to the public?
- We have received info that the Agency is rotating reviewers within team every 3 months – further clarification?

Currently, participants from our side will be: Ray McAllister, Bob Hamilton, Jack Cain and me. Thanks for your willingness to meet with us.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
Building
51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:59 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

At the most 4 – 5 folks from our side.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

Crop Science Division
Bayer CropScience LP
BCS-REG-REGU, Registrations
Building
51368 Leverkusen, Germany

Tel: +1 919 549 2628
Fax: +1 919 549 2475
Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Friday, April 08, 2016 8:54 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com); Jack.Cain@dupont.com; BCSReg_Archive; Rate, Debra; Lewis, Susan
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Let me check and get back to you. How many people from your side would be attending?

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive

<esepamailbox@bayer.com>
Subject: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – as a follow-up to previous discussions with CLA members, we would like to visit with you at your convenience and get further clarification and/or guidance on the following topics:

- Next printing/released for shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions

Several of the members will be in town next week attending the CLA Spring Conference so we would propose meeting either Wed or Thurs (4/13 or 4/14) for approximately 1 hr during 10:00 to 11:30 AM or 1:00 – 4:00 PM. Would you be available during any of those times?

Thanks in advance!

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

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BCS-REG-REGU, Registrations
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Mobile: +1 919 3683414
E-mail: karen.cain@bayer.com
Web: http://www.bayer.com

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For alternate languages please go to http://bayerdisclaimer.bayerweb.com

Message

From: Hamilton, Robert [Bob.Hamilton@valent.com]
Sent: 11/8/2017 2:03:58 PM
To: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
CC: Kenny, Daniel [Kenny.Dan@epa.gov]; Jack.Cain@dupont.com; karen.cain@bayer.com; Timothy A Mahl [timothy.mahl@basf.com]; john.abbott@syngenta.com; Ray McAllister [rmcallister@croplifeamerica.org]
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, have you had a chance to review the summary of our meeting? Do you agree with our bullet points? We have an RC meeting next week, and if you agree, we'd like to share the bullets with the group. Also, are you available to meet with the whole RC on December 13? We have invited Don Lott and would like to include you in that discussion if you are available.

Thanks, have a great day!

Bob

From: Hamilton, Robert
Sent: Friday, October 20, 2017 1:47 PM
To: 'Rosenblatt, Daniel'
Cc: 'Dan Kenny'; Jack.Cain@dupont.com; karen.cain@bayer.com; Timothy A Mahl; john.abbott@syngenta.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan-

Thank you for a productive meeting, we enjoyed meeting with you and appreciate your openness in finding paths forward on the issues that we discussed. You'll see that Karen has already gotten in touch with Don Lott and we are scheduling him as a guest for our upcoming RC meeting. Thank you for your help and insight.

Attached are the bullet points that I wrote down from our meeting. Will you please review and give your comments?

Thanks again, I'll be in touch about setting up another discussion in a few months.

Best,

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, September 11, 2017 2:43 PM
To: Hamilton, Robert
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – ok. 1 pm and 4 pm are free for me on that day.

From: Hamilton, Robert [mailto:Bob.Hamilton@valent.com]
Sent: Monday, September 11, 2017 2:05 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com; Ray McAllister <rmcallister@croplifeamerica.org>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, does the afternoon of October 16th work for you?

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
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To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Bob – I'm slated to go to the IR-4 food use work shop which will be that day and that meeting is out of town.

So could we look at a different day to set the next discussion up?

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Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, would you be able to meet with us on the morning of Wednesday, September 20? We'll have folk in town and could come over to see you if that morning works for you. I won't be there, but Ray, Karen and other will.

Thank you, Have a great day.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Tuesday, July 11, 2017 2:20 PM
To: Hamilton, Robert
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Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

No worries – Bob.

Just relay if you all would like a re-set for scheduling it later.

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Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, I have to give you the time back on your calendar on July 19th at 1pm, many of our participants (now, also including me) have conflicts. I'm sorry to set this up and then ask to reschedule. I'll get in touch with you to propose a different date, but for now, you have an extra hour on your calendar!

Thank you for understanding.

Back in touch soon.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Friday, June 23, 2017 4:20 PM
To: Hamilton, Robert

Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Yes – good. See you all then.

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Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, Thanks for the note. We'd be happy to come over and see you. How about 1pm on the 19th? I'll follow up next week.

Have a great weekend.

Bob

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To: Hamilton, Robert
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
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Dan
703-308-9366

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Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, I hope that you are having a good summer. Have you had a chance to check your calendar to see if you might have an hour to meet with CLA RC representatives on either July 17th or 19th? We look forward to talking with you soon.

Best regards,

Bob Hamilton

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Sent: Wednesday, May 24, 2017 12:44 PM
To: 'Rosenblatt, Daniel'
Cc: karen.cain@bayer.com; Ray McAllister (RMcAllister@croplifeamerica.org)
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I appreciate your time and look forward to seeing you again.

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From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Wednesday, February 22, 2017 6:06 PM
To: Hamilton, Robert
Cc: karen.cain@bayer.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Good deal thanks Bob. I thought it was a good discussion too.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Wednesday, February 22, 2017 5:09 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: karen.cain@bayer.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

Thank you for a good meeting, I appreciate your time, candor, and willingness to work with us.
I'm out for the next few days, but next week I'd like to call you to set up the next one and see if we can brainstorm a way to make these discussion even more productive and actionable for both of us!

Thanks again,

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Wednesday, February 15, 2017 9:18 AM
To: Hamilton, Robert
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sounds good.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Wednesday, February 15, 2017 9:12 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan, our group will plan to come over on Wednesday 2/22 to meet with you at 2pm for an hour. We'll plan to arrive a few minutes early and I'll call you to let you know we're in the lobby, if that works for you. Let me know if you want to do it differently, or if you want me to call someone else to escort us to your floor.

Here is a list of the topics that we would like to discuss. We really appreciate the opportunity to informally meet with you.

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- First aid clarification memo next steps
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?
- Items that you would like to discuss with registrants.

Thank you very much, see you next week!

Best,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 5:21 PM
To: Hamilton, Robert
Cc: Ray McAllister (RMcAllister@croplifeamerica.org); Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Ok – sure. Something that's informal works too.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 3:15 PM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: Ray McAllister (RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; john.abbott@syngenta.com
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

I'm glad to know that the time still works for you, we'll plan on it.

Historically, this has just been an informal discussion between CLA RC leadership and the RD deputy on a few topics to get your perspective and feedback. We'd like to see if we can find common ground to move forward on items which we both have interest in progressing. No preparation necessary, nor firm commitments required on your part. We just would appreciate the opportunity to visit and get your perspective. We will work on refining the list of topics and I will send them to you in advance of the meeting.

Make sense?

Thank you for your willingness to meet with us.

Best regards,

Bob Hamilton

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, January 23, 2017 12:05 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob - Yes – our meeting on 2/22 is still clear for my calendar. It would be good though to refine the topic list soon so that as needed additional EPAers can be there to have a really productive discussion.

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, January 23, 2017 11:22 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan:

We are still planning for February 22 at 2pm. Does that still work for you? As we get a little closer, I'll send you an updated topic list.

Thank you very much for agreeing to meet with us.

Bob

From: Rosenblatt, Daniel [mailto:Rosenblatt.Dan@epa.gov]
Sent: Monday, November 21, 2016 5:29 PM
To: Hamilton, Robert
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl; karen.cain@bayer.com; Herndon, George; Goodis, Michael
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Bob – All – I missed coordinating today with others from EPA on this. (And I'm about to take some time away due to Thanksgiving). So just to get out an immediate answer – sure – I'd propose that you all come over to EPA's Arlington building at say 2 pm on 2/22/17 for this. Does that work? I have a meeting room we can use. But we can adjust that timing and the agenda as it gets closer.

Dan

Daniel J. Rosenblatt, Deputy Director
Registration Division, Office of Pesticide Programs
e-mail: rosenblatt.dan@epa.gov
Phone: (703) 308-9366
URL: www.epa.gov/pesticides

From: Hamilton, Robert [mailto:Robert.Hamilton@valent.com]
Sent: Monday, November 21, 2016 11:10 AM
To: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Cc: rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Timothy A Mahl <timothy.mahl@basf.com>; karen.cain@bayer.com; Herndon, George <Herndon.George@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Hi Dan,

The CLA Registration Committee leadership has a standing tradition of informally meeting with an RD Deputy to discuss current topics of interest.
We have been meeting with Jeff, but now that he is in FEAD, we wonder if either you, or you and Jeff would be able to meet with us for an hour early in the new year. The way that this has worked in the past is that a few members of the CLA RC would come over to the Agency to meet with you to discuss topics of interest. This has traditionally been just a small, informal working session where we identify key issues and how we may be able to move the items forward. Topics that we would like to cover include:

- PR notice 98-10 update
- Reviewers preference
- Timing of substantially similar SOP
- Timing of first aid clarification memo
- Compulsory data citation
- As marijuana becomes legal in more states, how is the agency going to move forward? Still SLN?

We would like the opportunity to open the discussion with you and look forward to working with you. Please let me know if you have items that you would like to add to the list, we'd be happy to add them.
Our members will be in town on February 21, so if you have an hour on the 22nd, a few of us could plan to come over to the Agency to meet with you.

Will that work? If not, we can work to find the next available time.

Thank you,

Bob Hamilton

From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Thursday, April 14, 2016 7:21 AM
To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra; Lewis, Susan; BCSReg_Archive
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

OK, sounds good. See you at 1:30.

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Thursday, April 14, 2016 6:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; Jack.Cain@dupont.com; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – After polling our member companies, we have added a few topics to the list so I wanted to forward it to you in advance of the meeting (below). It is possible we won't be able to cover every topic within the 1 hour slot (1:30 – 2:30) so we may need further discussions.

- Next printing/Released for Shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions
- Tolerance petition section F crop groups versus labeling with crop groups/processed commodities

- Placement of first aid statement – 40 CFR 156.10
- Database of conditional registration data submitted to Agency available to the public?
- We have received info that the Agency is rotating reviewers within team every 3 months – further clarification?

Currently, participants from our side will be: Ray McAllister, Bob Hamilton, Jack Cain and me. Thanks for your willingness to meet with us.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

Science For A Better Life

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From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:59 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>; Rate, Debra <Rate.Debra@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

At the most 4 – 5 folks from our side.

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

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From: Herndon, George [mailto:Herndon.George@epa.gov]
Sent: Friday, April 08, 2016 8:54 AM

To: Karen Cain
Cc: Hamilton, Robert; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com); Jack.Cain@dupont.com; BCSReg_Archive; Rate, Debra; Lewis, Susan
Subject: RE: Clarification and Discussions w/ CLA RC members on several topics of interest?

Let me check and get back to you. How many people from your side would be attending?

From: Karen Cain [mailto:karen.cain@bayer.com]
Sent: Friday, April 08, 2016 8:51 AM
To: Herndon, George <Herndon.George@epa.gov>
Cc: Hamilton, Robert <Robert.Hamilton@valent.com>; rmcallister@croplifeamerica.org; John Abbott (john.abbott@syngenta.com) <john.abbott@syngenta.com>; Jack.Cain@dupont.com; BCSReg_Archive <esepamailbox@bayer.com>
Subject: Clarification and Discussions w/ CLA RC members on several topics of interest?

Jeff – as a follow-up to previous discussions with CLA members, we would like to visit with you at your convenience and get further clarification and/or guidance on the following topics:

- Next printing/released for shipment
- PR Notice 98-10 update
- Label recommendations for tank mix verbiage
- Pollinator IGR-fungicide interactions

Several of the members will be in town next week attending the CLA Spring Conference so we would propose meeting either Wed or Thurs (4/13 or 4/14) for approximately 1 hr during 10:00 to 11:30 AM or 1:00 – 4:00 PM. Would you be available during any of those times?

Thanks in advance!

Freundliche Grüße / Best regards,

Karen Cain
Sr Regulatory Manager
Federal Registrations

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