From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: Questions from RB
Date: 05/29/2012 03:03 PM

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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/29/2012 02:59 PM -----

From: John Hebert/DC/USEPA/US
To: "Ambuter, Hal" <Hal.Ambuter@reckittbenckiser.com>
Cc: Jennifer Gaines/DC/USEPA/US@EPA
Date: 01/27/2009 12:54 PM
Subject: RE: Questions from RB

Hal - For PRIA, if you are submitting data (other than product chemistry) that requires Registration Division review it automatically puts it in the R310 category. If you were only sending in bait station data, I would push for us to prioritize your review. It is definitely in our best interest to register products that comply with the mitigation. But of course, I have to say that 6 months is the official review time.

Regarding weatherability, I don't think we are intending to review data/studies. We're only looking for something like a "white paper" that explains, for example, why the bait station design will limit the amount of precipitation that can affect the bait. If still want us to look at something before you officially submit your application, I suggest that in place of a weatherability test design you let us see your "white paper."

John

▼ "Ambuter, Hal" ---01/27/2009 11:46:55 AM---John

"Ambuter, Hal"
<Hal.Ambuter@reckittbenckiser.com>

01/27/2009 11:46 AM

To John Hebert/DC/USEPA/US@EPA
cc Jennifer Gaines/DC/USEPA/US@EPA
Subject RE: Questions from RB

John

Thanks for the quick response....

I am concerned over the lack of a weatherability protocol. Perhaps we can describe the testing we are planning, and have you pre-approve it?

John

Thanks for the quick response.

I am concerned over the lack of a weatherability protocol and just relying on a description without data. Perhaps we can propose some protocols for you to pre-approve?

Second, is an R310 a 6 month review? We will be submitting data to hopefully support a Tier 1 rating = data on Tier 3, Tier 2, and weatherability for Tier 1....but using an already registered non-Gen 2 block. Still 6 months?

~ hal

-----Original Message-----
From: Hebert.John@epamail.epa.gov [mailto:Hebert.John@epamail.epa.gov]
Sent: Tuesday, January 27, 2009 10:59 AM
To: Ambuter, Hal
Cc: Gaines.Jennifer@epamail.epa.gov
Subject: RE: Questions from RB

Hi Hal - sorry if I didn't get back to you when you originally sent your email. Here are my responses.

1. There is not a protocol for weatherability. In lieu of a study/data we will accept a description of how the bait station design keeps out precipitation, limits the bait getting wet, etc.

2. The scenario you describe in your original question #2 sounds fairly straightforward. If you were only claiming Tier IV for the bait station, we could very quickly turn that registration around. The PRIA code would be R300 (with a 90 day review time) if no data were submitted.

3. Regarding the new question: It sounds like you will be submitting actual data on the bait station. If so, the submission will be coded as an R310. If you are only claiming Tier IV for the station, R300 is appropriate - like scenario #2 above.

Let us know if you have other questions. I apologize for any delays.

John

"Ambuter, Hal"
<Hal.Ambuter@rec
kittbenckiser.co
m>

01/27/2009 10:16
AM

To
John Hebert/DC/USEPA/US@EPA,
Jennifer Gaines/DC/USEPA/US@EPA

cc

Subject
RE: Questions from RB

John

I am not sure if this e-mail ever was delivered to you or not...

One new question:

What is the PRIA timeline for new registrations for a Tier'd bait station that is fully compliant with the mitigation measures...using an existing registered bait block (e.g. the only new data would be the test results on the bait station).

Thx
~ hal

-----Original Message-----
From: Ambuter, Hal
Sent: Wednesday, January 07, 2009 9:47 PM
To: 'Hebert.John@epamail.epa.gov'
Subject: Questions from RB

John

Happy New Year! Trust that you had a great holiday celebration.

Some questions for you.

1. Has EPA released any test protocols for "weatherability" for the Tier 1 bait stations?

2. We received two new registrations back in November 3282-90 and 3282-91, which were bait stations with Gen 2 bait blocks. As you are probably aware, New York state is refusing to allow registration of any new registration which is not fully compliant with the new mitigation measures....So, we would like to take these same two bait stations and switch out the Gen 2 bait block for a Gen 1 bait. The bait blocks will be using existing block registrations from another registrant --- so we would be citing their data like we did for the -90 and -91...Question....since you have already approved these stations and the new block is an existing registration, do you think we could obtain a fairly quick registration for these new stations?

Thanks for your time and attention...

~ hal

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