

MEMORANDUM DATE: May 14, 1987

SUBJECT: Tracking and Follow-up for PR Notice 87-01 Chemigation

TO: Registration Division Branch Chiefs, PMs, Sections Heads

FROM: Edwin F. Tinsworth, Director Registration Division (TS-767C)

Following is an outline of registrant and Agency actions for accommodating PR Notice 87-01 on chemigation.

Scheduled Actions Directed by 87-01

I. Registrants of products not subject to PR Notice - need take no action.

II. Registrants of products not exempted but believed by registrant should not be subject - must submit by July 31, 1987, latest accepted label and written justification: then wait for Agency response.

III. Registrants of products which are subject:

A. If registrant intends to use PR 87-01 language (either prohibition or use directions) he must:

1. 1. Submit a letter of intent by July 31, 1987
2. 2. Submit certification and final printed labeling by April 30, 1988.

B. If registrant intends to use other language he must submit amended registration by July 31, 1987.

IV. Sec 5s and 18s - Agency will accept only labeling revised according to PR 87-01 after April 30, 1988.

V. Sec 24(c)s - Registrants must submit labeling revised according to PR 87-01 to States by April 30, 1988. Agency Activities

I. Green cards (from certified mail) are being entered onto computer program by RSERB for future reference.

II. Phone calls and letters with questions are being answered by Ellwanger.

III. Letters of intent are being routed to PMs.

IV. First deadline is July 31, 1987 when registrants whose products are subject must either submit a letter of intent (those who will use PR-1 language) or an amended registration (those using different language). Those not responding as of that date must be assumed to be either not subject or not in compliance with PR 87-01. At that point we won't know which is the case since it is up to the registrant to decide if his product is subject.

V. Letter of intent will be sent to appropriate PMs to be placed in registration jackets. PM Teams should keep a running list of letters of intent.

VI. Chemigation amendments will be processed in the usual way except that TSS efficacy reviewers will be included in the process to evaluate appropriateness of proposed label language.

VII. Second deadline is April 30, 1988 for submittal of certification and final printed labeling from registrants who indicated they would use PR 87-01 language. This labeling should not need to be reviewed.

III. A comparison can be made of letters of intent (from July 31, 1987) and those responding to April 30, 1988 deadline. Labels and certification will be placed in registration jackets by PM Teams. PM Teams should check off the running list those which submit certifications and labels. Those indicating intent but not submitting certifications and labels will be forwarded to Compliance Monitoring by PMs. The green card return list will be made available to enforcement to check which registrants received 87-01.e appropriate Product Manager at EPA for all Federally registered products.