



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 12 2019

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Rick Pate  
Commissioner  
Alabama Department of Agriculture and Industries  
1445 Federal Drive  
Montgomery, Alabama 36107-1123

Dear Mr. Pate:

The U.S. Environmental Protection Agency (EPA) greatly values its partnership with state lead agencies, and we recognize the states as our co-regulatory partners. We appreciate you engaging with the agency on the issue of special local need determinations involving state registrations under section 24(c) of the Federal Insecticide, Fungicide, and Rodenticide Act.

The EPA understands your concerns and acknowledges that state flexibility is important when approving new uses. While EPA is now re-evaluating its approach to reviewing 24(c) registrations and the circumstances under which it will exercise its authority to disapprove those registrations, we are not making any immediate changes in this area. We also do not expect any potential changes will impact 24(c) registrations that states approve ahead of the 2019 growing season. Before making any changes in this regard, the EPA intends to take public comment on any potential new approaches before adopting them.

We look forward to a robust public dialogue with our stakeholders, partners, and co-regulators on this matter. In the meantime, please feel free to contact Kable Davis of my staff at [davis.kable@epa.gov](mailto:davis.kable@epa.gov) or (703) 306-0415 with any additional questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Richard P. Keigwin, Jr." with a stylized flourish at the end.

Richard P. Keigwin, Jr., Director  
Office of Pesticide Programs