



State of Alabama

Send the Section 24(c) application package to:

Alabama Department of Agriculture & Industries
Pesticide Management Section
P.O. Box 3336
Montgomery, AL 36109-0336

For additional information, contact:

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Pesticide Management Section Website:

www.agi.state.al.us/pppm.htm

Materials required in the Section 24(c) application package:

A total of 10 copies of the application package need to be submitted containing:

1. A letter requesting the 24(c), Special Local Need, Registration including:
 - a) name, address and point of contact of applicant (registrant);
 - b) name of the pesticide product and EPA Registration Number (if applicable) and the requested use;
 - c) identification of the Special Local Need within Alabama, the specific geographic area of need, and how this pest impacts this site within Alabama;

- d) documentation that a currently federally registered pesticide:
 - 1) is not available in the state for the desired site(s) to adequately control the target pest; or
 - 2) cannot be applied without causing unacceptable risks to human health or the environment, or
 - 3) is necessary to maintain an IPM, resistance management, or minor use pest control program, or
 - 4) could be replaced by a formulation that poses less risk to man or the environment.
2. A completed EPA form 8570-25 (*Application For/Notification of State Registration of a Pesticide to Meet a Special Local Need*). This will help the State Review Committee to have a better understanding of previous denial by the EPA, whether it is already Section 24(c) registered in other states, etc.
3. Letters of support from specialists within the forest nursery field, the field of the pests, or from chemical companies if a 3rd party registration (Extension specialists, University faculty, private consultants, USDA employees, chemical company representatives, forest industry employees). These letters are needed to further show that an actual pest problem exists, that this chemical can provide better or safer control, and for the Expert Review Committee to have contacts to ask questions about the registration or to invite for expert testimony. Within reason, the more letters presented the better.
4. A complete EPA registered label and the proposed Section 24(c) label and a statement of claims to be made for it including directions for use.
5. A short summary of the studies available that show the efficacy, human health, or environmental impacts of a pesticide. For products that are anticipated to be used statewide, it would be best to provide data from both fine and sandy soils (generally the Piedmont and the Coastal Plain; respectively). Data can be submitted from other states if the site conditions (soils, climate, etc.) are similar to the proposed use areas in Alabama. Data from other states are much more willingly accepted if the chemical has already been Section 24(c) labeled within another State. If Alabama is the first or only state to be Section 24(c) labeled for the product, generally, more data must come from Alabama.
6. A full description of the tests made, and the results thereof, upon which the claims are based.

Review Process: Upon receiving a Section 24(c) registration package the Pesticide Management Section (Section) initially reviews it (Tony and Dr. Pat Morgan). They informally contact the EPA immediately to determine if the EPA has any serious concerns about this pesticide. After it is reviewed internally within the Section it is sent to the State Review Committee. The current Chairman of the Committee is Dr. John Everest who is a weed scientist extension specialist and professor employed by Auburn University. The Committee is composed of 9 people. There are two plant pathologists, two weed scientists (including Dr. Everest), two entomologists, one Assessment Pesticide Educator, one person from the fisheries field, and the final person is a toxicologist. Dr. Everest recommends that you call him before applications are even submitted. This way concerns can be addressed that can save a lot of time and money. To some extent the

review is open to the public. People who feel that they can offer constructive discussion about a Section 24(c) should contact Dr. Everest. The committee often invites specialists from the forest nursery field and other fields related to the specific special local need to present testimony. The Committee makes a verdict about the Section 24(c) and sends the application and its decision back to the Section for final review. If it is approved by the Pesticide Management Section (it can now legally be used in the State of Alabama even if the EPA later rejects the SLN) it is sent off to the EPA for its approval. Prior to use of this pesticide, legally, the applicator must have the approved Section 24(c) label “in hand.” The EPA has 90 days to make a decision after they receive the application of whether they agree with the State of Alabama. If the EPA rejects the SLN, from then forward the pesticide is not legal for that proposed Section 24(c) site within Alabama.

Fees: \$100 per product per year (must register the SLN each year).

Other relevant information: Third party registrations are very rare within Alabama. All 3rd party registrants assume liability for the product. Usually chemical companies pass liability from themselves to the 3rd party by use of waiver forms. There is no periodic review of Section 24(c)s as long as the registrant annually registers the Section 24(c) with the State.

Current Section 24(c)’s within the State of Alabama for forest nurseries:

Dimilin 25W Insecticide (pine tree nurseries)	First registered in 1987
Pounce 3.2 EC Insecticide (conifer nurseries)	First registered in 1994
Reflex Herbicide (pine seedling nurseries)	First registered in 1995
Warrior T Insectide (conifer nurseries)	First registered in 1999