



State of Tennessee

Send the Section 24(c) application package to:

Jace Burch
Tennessee Department of Agriculture
Regulatory Services – Ag Inputs & Pesticides
P.O. Box 40627, Melrose Station
Nashville, TN 37204

For additional information, contact:

Jace Burch
Tennessee Department of Agriculture
Regulatory Services – Ag Inputs & Pesticides
P.O. Box 40627, Melrose Station
Nashville, TN 37204
Phone: (615) 837-5187
Fax: (615) 837-5012
Email: Jace.Burch@state.tn.us

Regulatory Services – Ag Inputs & Pesticides Website:

www.state.tn.us/agriculture/regulate/regulat3.html

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

A total of 2 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 Tennessee, the specific geographic area of need, and how this pest impacts this site within Tennessee;
 - 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 to provide a better understanding of previous denial by the EPA, whether it is already Section 24(c) registered in other states, etc.
3. A letter of support from a University of Tennessee Extension Specialist. Generally these are agricultural specialists. These letters are needed to further show that an actual pest problem exists and that this chemical can provide better or safer control.
4. A complete EPA registered label and the proposed Tennessee Section 24(c) label and a statement of claims to be made for it including directions for use.
5. Efficacy, human health, or environmental impact data consistent with labeling dosages. Data can come from other states as long as the soil and climate characteristics are similar. If the pesticide is climate dependent then the Division may require that the data come from Tennessee. Generally you only need to submit one study.
6. A narrative detailing and evaluating any additional risks to man and the environment that may be posed by this product when used in accordance with its proposed special local need registration. The evaluation should include a discussion about possible hazards from exposure to applicators, field workers, non-target plants and animals, and surface and ground water.
7. Material Safety Data Sheet (MSDS) including a statement of emergency treatment.

Review Process: Once the agency receives the application it is looked over to make sure that all the required materials are included. There is no formal Review Committee in the State of Tennessee for Section 24(c) registrations. Jace Burch, John Ewell, and a University of Tennessee Extension Specialist knowledgeable in the field of forest nurseries meet and review the application. If they approve the application then it is sent off to the EPA. The pesticide is now legal for use in the State of Tennessee whether the EPA later rejects the Section 24(c) registration or not. However, in order for the chemical to be used legally, the applicator must have the Tennessee approved Section 24(c) label “in hand.” From the time the EPA receives the application package from the Regulatory Services – Ag Inputs & Pesticides agency it has 90 days to agree or disagree. If the EPA fails to agree on the Section 24(c) registration then it cannot be used legally within the State of Tennessee from that point forward for that particular Site.

Fees: \$250 application fee that is valid for 5 years.

Other relevant information: Generally the review process is concluded within one month. The State of Tennessee does not accept 3rd party registrations. The Section 24(c) registration is valid for five years from the date of approval. After this period a new Section 24(c) application has to be submitted.

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

Pounce 3.2 EC Insecticide (only for conifer nurseries) First registered in 2002