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**From:** StClair, Christie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=06618C5ED0E744A3BFE8443360018C26-STCLAIR, CH]  
**Sent:** 7/14/2017 4:39:24 PM  
**To:** David Heldreth [Ex. 6]; Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]  
**Subject:** RE: General Hydroponics Special Local Needs pesticides for cannabis applications

David, I'll check into this for you. What's your deadline?

Christie

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**From:** David Heldreth [Ex. 6]  
**Sent:** Friday, July 14, 2017 12:36 PM  
**To:** Press <Press@epa.gov>  
**Subject:** General Hydroponics Special Local Needs pesticides for cannabis applications

Hi, I was hoping to see if the EPA had received the request to withdraw the registrations from Washington, California, Vermont or Nevada and if General Hydroponics has submitted the request to voluntary cancel the registrations as well. Related info below.

- **Request to Withdraw a 24(c) Registration.** In order to process a withdrawal, the PM Team must receive a request to withdraw the 24(c) registration from the state that issued the 24(c).
- **Request to Voluntarily Cancel a 24(c) Registration.** In order to process a voluntary cancellation, the PM Team must receive a request from the registrant that maintains the 24(c) registration. Also, the registrant should send a copy of the voluntary cancellation request to the state that issued that 24(c). A Federal Register Notice will be issued which allows 90 days from date of publication for comment on the request. A cancellation order listing the 24(c) registration number will be prepared and signed. The cancellation order is then sent to the registrant via certified mail and cancellation information is posted to OPP data systems. A registrant can choose to withdraw a request for voluntary cancellation during the comment period by submitting a request in writing to the Agency. If a third party is interested in the continuance of the registration, they should contact the appropriate registrant.

If the states and General Hydroponics withdraw their applications, will they be able to reapply after comment is given regarding the EPA denial and cancelation in the federal register? Could comment from the public after the publication cause the EPA to change their decision?

Has the EPA had any of the aforementioned states file appeals or try to overturn the EPA decision? How would they do so?

Furthermore, the state of Washington says they plan to keep these registrations on their list of approved pesticides to be used on cannabis. While the products won't be labeled for the use of cannabis specifically by the registrant, they will be on the state approved list. Is this in violation of the rule that says: If a disapproval is issued, sale and distribution by the registrant or other persons would be in violation of §12(a)(1)(A) beginning on the date of disapproval. Or is the withdraw notice from the state prior to official disapproval effectively circumventing this rule by never getting a formal disapproval and instead the EPA has so far only sent letters of

intent to disapprove?

David Heldreth

**Ex. 6**