

**VIRGINIA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES**  
**DIVISION OF CONSUMER PROTECTION**  
**OFFICE OF PESTICIDE SERVICES**

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**Guidance Document number:** 5034  
**Subject:** Requirements for a Section 24(c) Submission  
**Issue date:** December 11, 2014 (Updated)  
**Expiration date:** In effect until otherwise rescinded

**PURPOSE:** To provide guidelines and establish minimum requirements the submission of requests to approve Special Local Need Registrations as permitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). FIFRA Section 24(c) grants states to permit additional uses of pesticide to meet special local needs within the state.

### **General Requirements**

The following information is required for a Section 24(c) submission. Information submitted will be reviewed for completeness by the Office of Pesticide Services, and then distributed for review by a committee of university researchers. Requests are usually processed and a decision is made to approve or deny the request in four to six weeks.

1. Completed EPA application form (8570-25);
2. Proposed Section 24(c) label;
3. Letter of support from a representative of VPI&SU or VSU, documenting the nature of the "special local need" for Virginia;
4. Data to support how the product meets the need (e.g., greater safety or effectiveness);
5. Executive summary/report and findings of the toxicological studies (human and environmental) and environmental fate studies existing for the product including:
  - a. Biological Activity and Use
    1. purpose
    2. general information
    3. field biological activity
    4. mode of action and symptomology
    5. uptake (absorption) and translocation characteristics
    6. plant selectivity and weed sensitivity
    7. end use products and their uses
  - b. Fate Behavior in the Environment
    1. environmental properties of the molecule
    2. fate in soil
    3. fate in aquatic environments

c. Animal and Plant Metabolism

d. Toxicity of the Technical Active Ingredient

1. acute oral toxicity
2. acute dermal toxicity
3. acute inhalation toxicity
4. skin irritation
5. eye irritation
6. skin sensitization
7. sub-chronic toxicity
8. chronic toxicity
9. reproductive toxicity
10. genotoxicity
11. neurotoxicity

e. Human Exposure, Risk and Safety Information

1. consumer exposure and risk
2. occupational exposure and risk
3. aggregate exposure and risk

f. Wildlife and Other Non-Target Species

1. avian species
2. aquatic species
3. soil microorganisms
4. non-target aquatic plants
5. other non-target organism
6. non-target terrestrial plants
7. environmental risk

g. Metabolites

1. metabolites from break down of product
  2. potential impact or effect of metabolites in ground water
  3. potential impact or effect of metabolites in surface water
  4. potential impact or effect of metabolites on aquatic species;
6. Potential impact or effect of metabolites on the food chain;
7. Residue study data, as appropriate, for the requested use (food, tobacco);
8. Pyrolysis data, in the case of a requested tobacco use;
9. Seven (7) copies of the complete packet (inquire about submitting electronic copies);
10. Registration fee: \$160, if the product is not already registered in Virginia.

Requests should be addressed to:  
Vickie B. Rengers, Supervisor, CLRT  
Office of Pesticide Services

If you have any questions, please contact:  
Micah B. Raub, Program Coordinator  
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