

# ADAMS TECHNOLOGY SYSTEMS

5145 FOREST RUN TRACE - SUITE B • ALPHARETTA GA 30022-4504  
Phone: 770-751-1073 • Fax: 770-751-1173  
www.AdamsTechnology.com • E-mail: AdamsTech@ATS2.com

## ATSSC STANDARD OPERATING PROCEDURE

SOP for:	<b>STATES REQUIRING CSF'S</b>	REV# <b>03</b>	SOP# <b>47</b>
SOP Written/Revised by:	Rob R. Adams, Jr	Rev. Date:	07/01/05

### I. PURPOSE

Adams Technology State Pesticide Registration Service Center (ATSSC) must submit an EPA Confidential Statement of Formula (CSF) (EPA Form# 8570-4) as part of the application package to certain states. This SOP explains the procedure for companies that choose to submit the CSF directly to the states instead of providing it to ATSSC.

### II. RESPONSIBILITY

Primary: Senior Registration Specialists  
Secondary: ATSSC Service Center Manager

### III. PROCEDURE

1. The states of **CA, CO, FL, HI, NY and WA** require a copy of the CSF. On behalf of our client, please draft a cover letter and submit the CSF directly to these states.
2. Note: Iowa no longer requires a CSF.
3. **Letter:** The subject of the letter should contain:
  - a. The Registrant's Company Name
  - b. New Product Name being registered
  - c. EPA Reg# of the Product being registered.
4. **Copy of CSF:** It is critical to that an actual copy of the CSF is sent with the letter. Some states will not go to another file and make a copy for the New Product application. They will just return the entire package to us until they receive the copy of the CSF.
5. **California Notice 2004-10** contains a suggested "Sample Letter of Authorization for Product Registration." This notice and sample letter have been attached to the end of this SOP. The CA sample letter is available as a MS Word file. For a copy send an Email to: AdamsTech@ATS2.com
6. **Blanket Permission:** Regardless of the individual state policy, it is helpful and expedites the registration process if the cover letter gives permission for the state to consider any other information in their files during the review of the application package. Please give a product name and EPA Reg# of any files that would contain the bulk of the information, studies or data. This especially important for California and New York.
7. **Copies to ATSSC:** These letters need to be done as soon as possible! We may not start the registration application process without these permission letters. So we are not delayed in processing the registration paperwork packages, please email (preferred) or fax a copy to us. In addition, mail hard copies to us for our files.
8. **Address's:** The following page lists the address's for the states.

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## ADAMS TECHNOLOGY STATE PESTICIDE REGISTRATION SERVICE CENTER (ATSSC)

### States That Require the Confidential Statement of Formula (CSF) (EPA Form# 8750-4)

#### CA, CO, FL, HI, NY, WA

Note: Iowa no longer requires a CSF.

#### CA (See recommended form attached!)

California Dept of Pesticide Regulation  
Pesticide Product Registration  
1001 I Street (typist note: this "eye" street)  
Sacramento, CA 95814-2828  
Ph: 916-445-4377 Fax: 916-324-1719

#### HI

Hawaii State Dept of Agriculture  
Pesticide Product Registration  
1428 South King Street  
Honolulu, HI 96814  
Ph: 808-973-9415 Fax: 808-973-9418

#### CO

Colorado Dept of Agriculture  
Pesticide Product Registration  
700 Kipling Street - Suite 4000  
Lakewood, CO 80215-5894  
Ph: 303-239-4147 Fax: 303-239-4177

#### NY

NY State Dept of Environmental Conservation  
Pesticide Product Registration  
625 Broadway  
Albany, NY 12233-7257  
Ph: (518) 402-8768 Fax: (518) 402-9024

#### FL

Florida Dept of Agriculture  
Pesticide Product Registration  
3125 Conner Blvd - Lab 6  
Tallahassee, FL 32399-1650  
Ph: 850-487-2130 Fax: 850-488-5874

#### WA

Washington State Dept Agriculture  
Pesticide Product Registration  
1111 Washington - 2nd Floor NRB Bldg  
Olympia, WA 98504  
Ph: 360-902-2030 Fax: 360-902-2093

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## California Notice 2004-10

September 3, 2004

TO: Registrants of Pesticide Products

SUBJECT: **Sample Letter of Authorization for Product Registration**

The California Department of Pesticide Regulation (DPR) has developed a sample letter of authorization. This sample letter may be used by companies to assist them in writing a letter of authorization.

To obtain registration, and for many amendments, scientific data are required to be submitted. In lieu of submitting required data, an applicant may rely on data submitted to DPR by another company, if a current letter of authorization is submitted by the owner of the data. However, letters of authorization submitted to DPR are sometimes incomplete or inappropriate for the requested registration action, in which case, DPR must return or deny the registration request.

As indicated on the attached sample letter, the letter of authorization must be on the authorizing company's letterhead, and must have the correct and current name of the data owner company and a current date. It is extremely helpful if the authorizing company provides the Detail Report volume numbers which were assigned to the data by DPR when the data were initially submitted. If the data were submitted under a previous company name, include that company name and firm number in the letter.

It is also advisable for the authorizing company to time their letter to arrive with the registration request or have the requesting company include a copy in their submission. If submitted separately, the authorizing company should also send a copy of the letter of authorization to the requesting company. Please note that a company may not withdraw a letter of authorization after the registration action is completed.

Letters of authorization signed by consultants or agents are not allowed unless the agent designation letter specifically states that the consultant/agent can issue a letter of authorization.

To reduce the number of returns and to increase efficiency in the registration process, the enclosed sample letter is being provided for your convenience. For more information about data requirements and letters of authorization, see the California Notice to Registrants 2002-3.

Please contact your DPR registration specialist if you have questions.

Sincerely,

signed by Barry Cortez, Chief  
Pesticide Registration Branch  
(916) 445-4377

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## California SAMPLE Letter of Authorization

Must be on the letterhead of authorizing company.

ATS has edited this sample letter for this SOP.

This letter is available as a MS Word file. For a copy, send an Email to: AdamsTech@ATS2.com

Date:

To: California Department of Pesticide Regulation

Subject: Letter of Authorization for name of company seeking registration

The name of authorizing company authorizes the California Department of Pesticide Regulation (DPR) to reference our data in support of registering the following product(s):  
EPA Reg. No. \_\_\_\_\_

Product Name: \_\_\_\_\_

Company Name: \_\_\_\_\_

We authorize only the following specified studies (List DPR volume numbers when available):

\_\_\_\_\_.

or

Check all that apply. Please check only data that are required for this specific registration action.

<u>Types of data DPR is authorized to reference</u>	<u>DPR assigned volume # from Detail Report</u>
<input type="checkbox"/> Acute Toxicology	_____
<input type="checkbox"/> Product Chemistry	_____
<input type="checkbox"/> Efficacy	_____
<input type="checkbox"/> Residue Chemistry, if applicable	_____
<input type="checkbox"/> Phytotoxicity, if applicable	_____
<input type="checkbox"/> Fish and Wildlife, if applicable	_____
<input type="checkbox"/> Chronic Toxicology for new active ingredient	_____
<input type="checkbox"/> Environmental Fate for first agricultural use	_____
<input type="checkbox"/> Other (specify) _____	_____

For informational purposes only, these other similar product(s) were registered in California using this data: Product name and EPA Reg. No.

We understand that this authorization is only for this registration action. We understand this letter of authorization does not release the data to another company, but only allows DPR staff to reference the data in support of this registration action.

Signed by employee of authorizing company, title

cc: Adams Technology Systems (Email or Fax a copy so we may process the application to California)  
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