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OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

Mr. Jim Yowell
AGTROL INTERNATIONAL
7322 S.W. Freeway, Suite 1400
Houston, TX 77074

Dear Mr. Yowell,

I am writing in response to your letter of October 6, 1999 regarding EPA's failure to include Agtrol in the RED Chapter review simultaneously with the TPTH Task Force.

As I have noted in our earlier conversations, we are very sorry about the mix-up which resulted in Agtrol being inadvertently left out of our communications with the Task Force on the progress of the RED. Our perception was that Agtrol was working with the TPTH Task Force when we sent out the RED chapters to the Task Force. When we spoke in September and this error was brought to my attention, we did attempt to bring you back into the process as quickly as possible, offering to meet with you to discuss, in some detail, our risk assessment findings. Furthermore, we then ensured that Agtrol was involved in all subsequent conversations and communications regarding the TPTH RED.

Despite your contention that Agtrol had received "no notice from EPA regarding the development of a RED for TPTH," I would point out that Agtrol was part of the SMART meeting in November 1998 and was aware of the fact that TPTH was scheduled for a RED in FY 99. Although Agtrol was not as involved in all stages of the RED, Agtrol was involved in the key phase when risk mitigation options were being discussed. Moreover, in the case of TPTH, we will be extending the usual 60-day comment period to 90-days, at your request, to provide Agtrol with sufficient time to comment on the Agency's risk assessment and reregistration eligibility decision. We anticipate opening the comment period in November 1999 and will specifically inform you of the Federal Register Notice publication announcing the opening of the comment period for the TPTH RED.

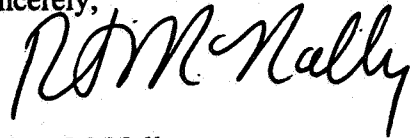
In the future, the Agency hopes to institute a RED process that builds on the OP-pilot process. This process would provide several opportunities for registrants and other interested

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parties to provide comments on the Agency's risk assessment and risk management proposals, prior to issuance of the RED. We believe that this process will avoid some of the concerns expressed with respect to the TPTH RED process as well as for other non-OP REDs.

We look forward to your comments on the TPTH RED.

Sincerely,

A handwritten signature in black ink, appearing to read "R. McNally". The signature is written in a cursive, slightly slanted style.

Robert McNally
Chief
Special Review Branch