

July 18, 2005

Public Information and Records Integrity Branch (PIRIB) (7502C)
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue. Washington, D. C. 20460

Attention: Docket ID OPP-2005-0069

Ladies & Gentlemen:

The Inerts Steering Committee (ISC), a joint effort of CropLife America and the Chemical Producers and Distributors Association, requests a 30-day extension for the comment period on the draft rule proposing to revoke 34 exemptions from the requirement of a tolerance, (70 FR 31401; June 1, 2005). If granted, the new deadline would be August 31, 2005.

All pesticide registrants, registrant suppliers, and adjuvants producers need to:

1. Review current pesticide product confidential statements of formula (CSFs) for presence of these inert ingredients;
2. Review new products under development for plans to use any of these inert ingredients;
3. Contact inert ingredient suppliers concerning use of these ingredients in proprietary blends used to formulate their products;
4. Review compositions of adjuvant products for presence of these ingredients; and
5. Review their new adjuvants under development for plans to use any of these ingredients.

For many suppliers of inert ingredients, the pesticide formulation market is a very minor portion of their business, so they may not follow this regulatory scene closely. Given complex confidential business arrangements surrounding proprietary blends and the involvement of international suppliers, it will take additional time to make certain that all potentially interested parties are advised of the proposed actions and the potential consequences.

Both trade associations have distributed the Federal Register notice to their members outlining the issues and urging them to contact EPA according to the instructions given there. This effort is complicated and time consuming, and our registrants, registrant suppliers, and adjuvant producers need some additional time to comply with this Federal Register notice.

Sincerely,

<<signed>>

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