

eRegulationsAgency : ENVIRONMENTAL PROTECTION AGENCY

Title : Pesticides; Emergency Exemption Process Revisions
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Regulations.gov #: EREG - 1 Submitted Sep 24, 2004

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Comment : As the primary person who prepares and submits section 18 requests for Idaho, I support these proposed rules.

I have participated in the pilot project for recertification of some active ingredients. It was a simple and easy process and saved me a lot of work in preparing the repeat request. I would encourage the USEPA to further expand this procedure to apply to a broader range of active ingredients. I believe that

less than 10% of repeat requests can even qualify for this process, yet the vast majority of my requests do not change very much from one year to the next. It is common to send in a

repeat request with less than 100 words changed in a 12 page request. It would seem logical to me to allow this simplified process for any Section 18 that has a minimal amount of change

from the previous year's request.

I also support the change in the way that the economic issue is evaluated. The proposed change will allow unconventional requests to be assessed in a more logical manner. It will also

allow a level playing field for minor use and unconventional crops that do not have as much data developed by registrants and universities. Minor crops rarely have as much attention paid to them and end up with far less data available for assessment.