

METAM-SODIUM ALLIANCE

AMVAC CHEMICAL CORPORATION ♦ TAMINCO, INC. ♦ TESSENDERLO KERLEY, INC.

October 4, 2004

Via E-Mail

Debra F. Edwards, Ph.D.
Director, Special Review and Reregistration Division
Office of Pesticide Programs
Registration Division, MC: 7508C
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Metam-Sodium/Risk Assessment/Soil Fumigant Cluster Assessment

Dear Debbie:

Based on the United States Environmental Protection Agency's (EPA) recent communications of its plans with respect to the Soil Fumigant Cluster Assessment and the relevance of the revised risk assessment for metam-sodium in the context of the cluster assessment, the registrants of metam-sodium are modifying their request for an extension of the comment period, to request that EPA extend the comment period on the revised risk assessment for metam-sodium until 60 days following the release of the Scientific Advisory Panel (SAP) reports on the three models for measuring exposures to soil fumigants. Our reasons are set forth below.

As we understand it, EPA intends to seek comment on another "short-form" risk assessment of metam-sodium shortly, perhaps as early as next week. This document reportedly will be almost identical to the risk assessment on which EPA is now seeking comments, which are due October 31 (November 1), 2004. EPA has verbally acknowledged the importance of the reports of the two SAPs on the fumigant exposure models that were reviewed in August and early September. Neither comment period will reflect those reports as they are not scheduled to be released until November.

In light of the key relevance of the SAP reports, and the fact that EPA will be essentially seeking comment twice on the same risk assessment for metam-sodium, the registrants believe that it would be more efficient and a better use of limited Agency and registrant time and resources to collapse the comment periods on metam-sodium into a single comment period that follows release of the SAP reports. While we cannot speak for the registrants of the other five fumigants that are also part of the cluster assessment, we can report that there was widespread support for a deferral of comment on any fumigant risk assessment --

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short form or otherwise -- until after the SAP reports are available for review. In that the earliest deadline for EPA to review the fumigants is 2006, we see no reason to rush unnecessarily this process, particularly when haste would come at the expense of reasoned scientific analysis and critical scientific consideration by the SAP.

As we indicated previously, the metam-sodium registrants, joined by other fumigant registrants and users, would welcome an opportunity to meet with you and others to discuss the objective, timing, and approach of EPA's soil fumigant cluster assessment. Significant concerns with all aspects of the assessment have been identified and a focused discussion with EPA would be beneficial.

I will call your office to arrange a suitable time to meet.

Sincerely,

Ian S. Chart

Ian S. Chart
Metam-Sodium Alliance