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FROM: T. G. Grumbles

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Interoffice
Communication

SUBJ: EPA PESTICIDES INERTS POLICY

VISTA

At the CSMA Regulatory Conference, the Director of EPA Pesticide Programs, D. D. Campt discussed the agency's evolving policy on pesticide formulation inert ingredients. Basically, they have developed four lists. I believe we have received most of these lists.

LIST I - This contains 55 inerts which have known health or environmental hazards. The Agency plans the following for these chemicals.

- A. Encourage voluntary substitution
- B. Determine actual uses and exposure potential for each
- C. Initiate a data call-in for those with real hazards based on step (B)
- D. Do risk analysis on those in (C)
- E. Potentially remove chemicals from the acceptable inert list

LIST II - This contains 51 chemicals that have structural similarity to List I. The Agency plans the following for these.

- A. Flag certain chemicals for testing requirements
- B. Possibly take action similar to List I based on testing results

A new, more stringent review procedure will be initiated now for any registration applications that include List I and II inerts in the formulation.

LIST III - This list contains 800 chemicals of unknown toxicity. No immediate action was discussed.

LIST IV - This list contains 300 chemicals with little or no known hazard. No action is required.

The above is somewhat antidotal based on the presentation. However, it does give a fairly accurate picture of EPA's strategy.


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