



September 8, 2020

Ms. Elissa Reaves, Acting Director
Pesticide Re-evaluation Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

**Subject: Federal Register, Vol. 85 No. 174; Friday Sept 8, 2020 (Pages 55446-55448)
Pesticide Registration Review; Draft Human Health and Ecological Risk
Assessments for Several Pesticides for DDVP, Naled and Trichlorfon
EPA-HQ-OPP-2017-0720**

On September 8, 2020, EPA published the preliminary human health and ecological risk assessments for a number of active ingredients under docket EPA-HQ-OPP-2017-0720. The Federal Register notice announcing the availability of the risk assessments allows for a 60 day comment period.

AMVAC Chemical Corporation is hereby requesting a 60-day extension of this comment period, to end on January 9, 2021, for our three active ingredients covered in the notice as follows:

- 1) DDVP- Case No. 0310, Docket EPA-HQ- OPP-2009-0209
- 2) Naled- Case No. 0092, Docket EPA-HQ- OPP-2009-0053
- 3) Trichlorfon- Case No. 0104, Docket EPA-HQ- OPP-2009-0097

These risk assessments contain a vast amount of new information and we need additional time to thoroughly review and provide adequate comments. Additionally, EPA is convening a FIFRA Scientific Advisory Panel (SAP) to run from September 15 through 18, 2020 to seek additional advice on activities using new approach methodologies (NAM's) that have the potential to inform uncertainty factors for organophosphate compounds. This includes consideration of *in vitro* acetylcholinesterase data to develop data-derived extrapolation factors (DDEF's) and work by EPA's Office of Research and Development to develop a NAM for evaluating developmental neurotoxicity. As stated by the Agency, the SAP recommendations may impact the human health risk assessment for each of these active ingredients. Our scientific team and consultants will be busy attending this meeting and focusing on EPA's interpretation and use of these data. Additionally, the ongoing COVID-19 situation has negatively affected the availability and workflow of our scientists (as well as EPA's), making a 60-day response time very difficult, if not impossible.

If there are any questions or issues with this request, I can be reached at 949-221-6144 or via email at ChrisD@amvac.com.



Sincerely,

Christopher Davis

Christopher Davis, Regulatory Product Manager
AMVAC Chemical Corporation

cc: Christian Bongard (Trichlorfon chemical review manager)
Carolyn Smith (DDVP chemical review manager)
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