



AMERICAN SPICE TRADE ASSOCIATION, INC.

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April 18, 2023

Submitted electronically via Regulations.gov

Jonathan Witt
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
Environmental Protection Agency
Research Triangle Park
North Carolina, 27711
witt.jon@epa.gov

Re: National Emission Standard for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review – Comment Deadline Extension Request (Docket EPA-HQ-OAR-2019-0178)

The American Spice Trade Association (ASTA) respectfully requests that the Environmental Protection Agency (EPA) grant an extension on the comment period for the agency's ethylene oxide (EtO) emissions standards for sterilization facilities. In particular, ***we request that EPA extend the comment period by 90 days***. However, in order for this extension to meaningfully impact ASTA's ability to compile comments, ***we request that any extension is announced at least 30 days in advance of the current deadline*** of June 12, 2023.

Our association and our members appreciate the opportunity to provide comments on the proposed EtO emissions standards for sterilization facilities. The proposal raises a number of highly technical issues of great importance to our members and will have a major impact on our industry. We expect it will take us months to fully analyze and evaluate the impact of the proposed changes on the dozens of spice and seasoning ingredients that currently rely on the technology and to compile evidence outlining the use of EtO in our industry.

At the same time, our members are working to compile separate data in response to EPA's Proposed Interim Decision and Draft Risk Assessment Addendum for EtO (Docket EPA-HQ-OPP-2013-0244), for which the comment periods have been synchronized. Without an extension, we will not have sufficient time to develop meaningful comments for either proposal.

Given the significant changes that have been proposed to the uses of EtO in spice commodities and their ability to be treated domestically, we believe that EPA and the public will be best served by the



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submission of accurate and thorough information on the proposed EtO emissions standards for sterilization facilities, as well as and how it would impact spices.

Accordingly, we request a 90-day extension for the comment period. As mentioned previously, in order for this extension to meaningfully reduce the burden on our industry, it must be announced at least 30 days before the current comment deadline.

Please do not hesitate to contact us if you have any questions regarding this request. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, which appears to read "Laura Shumow". The signature is written in black ink and includes a long horizontal flourish at the end.

Laura Shumow
Executive Director
American Spice Trade Association