



AMERICAN SPICE TRADE ASSOCIATION, INC.

1101 17th Street, N.W. • Suite 700  
Washington, DC 20036 USA  
Tel: 202-331-2460 • Fax: 202-463-8998  
E-mail: info@astaspice.org  
Web: www.astaspice.org

April 18, 2023

*Submitted electronically via Regulations.gov*

Jessie Bailey  
Chemical Review Manager, Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC, 204060  
bailey.jessica@epa.gov

**Re: Pesticide Registration Review; Proposed Interim Decision and Draft Risk Assessment Addendum for Ethylene Oxide; Notice of Availability - Comment Deadline Extension Request. (Docket EPA-HQ-OPP-2013-0244)**

The American Spice Trade Association (ASTA) respectfully requests that the Environmental Protection Agency (EPA) grant an extension of the comment period for the agency's proposed interim decision (PID) for ethylene oxide (EtO) and associated draft risk assessment addendum. In particular, ***we request that EPA extend the comment period by 90 days***, for a total comment period of 150 days. 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 PID and draft risk assessment addendum. The proposal outlines new restrictions that will have a major impact on the spice industry and involves a number of highly technical issues that must be evaluated. For example, the PID is proposing a phased cancellation of EtO on spices and requesting documentation on each spice that does not have a viable alternative. 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 this documentation.

At the same time, our members are also working to compile separate data in response to EPA's National Emission Standard for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review (Docket EPA-HQ-OAR-2019-0178), for which the comment periods have been synchronized. Without an extension, we will not have sufficient time to develop meaningful comments for either proposed rule.



AMERICAN SPICE TRADE ASSOCIATION, INC.

1101 17th Street, N.W. • Suite 700  
Washington, DC 20036 USA  
Tel: 202-331-2460 • Fax: 202-463-8998  
E-mail: [info@astaspice.org](mailto:info@astaspice.org)  
Web: [www.astaspice.org](http://www.astaspice.org)

Given the significant changes that have been proposed to the uses of EtO in spice commodities and their ability to contain residues, we believe that EPA and the public will be best served by the submission of accurate and thorough information on the PID and associated draft risk assessment, 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,

Laura Shumow  
Executive Director  
American Spice Trade Association