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Re: EPA-HQ-OPP-2008-0766-0027, EPA's Proposed Interim Decision for mineral acids, including sulfuric acid

The following comments provide information from the Pacific Northwest potato industry to support EPA's Proposed Interim Decision for mineral acids, including sulfuric acid. These comments are being submitted on behalf of the Western IPM Center.

In Pacific Northwest potato production, sulfuric acid is not commonly applied by air, and is considered too heavy and dangerous (due to drift issues, etc.) for this application method. Neither a prohibition on aerial application nor the additional proposed label restrictions are expected to impact potato growers in the Pacific Northwest.

Respectfully,

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Katie Murray is the Western IPM Center's Information Network Coordinator for the Pacific Northwest. Katie has expertise in agricultural stakeholder engagement and assessment methods related to understanding pesticide usage and pesticide compatibility with IPM.

The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.

To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect agricultural stakeholder feedback and do not imply endorsement by Oregon State University or the Western IPM Center.