



APC Holdings
KMG-Bernuth, Inc.
Luxembourg-Pamol, Inc.

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EPA Extends Comment Period on Proposed Determination that Organic Arsenical Herbicides Are Ineligible for Reregistration

At the request of several user groups and the registrants, the United States Environmental Protection Agency (EPA) recently extended the public comment period on its Reregistration Eligibility Decision (RED) document for the organic arsenicals (MSMA, DSMA, CAMA and Cacodylic acid) to **December 13, 2006**. The National Cotton Council, the Professional Landcare Network, and the MAA Research Task Force (MAATF) requested the extension. The registrants and the product users all disagree strongly with the conclusions in the RED that the organic arsenicals do not meet the criteria for reregistration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the standard for dietary risk under the Food Quality Protection Act (FQPA).

The MAATF appreciates the extension, and intends to submit detailed written comments to EPA by the December 13, 2006, deadline. The MAATF continues to believe the crop and turf uses of the organic arsenicals meet both the FIFRA risk-benefit standard and the FQPA safety standard. The Office of Pesticide Program requires that arsenic found in surface water due to use of the organic arsenicals will not exceed 0.02 ppb. This concentration is undetectable and 500 times lower than the levels of arsenic allowed by EPA in drinking water, and more than 10,000 times lower than natural levels in the water in certain areas in the US. Studies conducted in those areas did not find any health effects related to arsenic exposure. Organic arsenical users are strongly encouraged to submit their own comments. Draft comment letters for turf producers and managers and cotton growers, as well as instructions for submitting comments, are available on the MAATF's website, www.maatf.com.

MAA RESEARCH TASK FORCE

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MSMA/DSMA/CAMA control certain weed problems in cotton and turf like no other herbicides. For example, there are no alternative selective postemergence herbicides available for control of mature crabgrass and tropical signalgrass weeds. Using organic arsenicals in weed-control spray programs helps to control weeds that have become resistant to other herbicides, and makes these products key tools for integrated pest management programs. In addition, cacodylic acid is a unique cotton defoliant that is important to cotton production, and is also used as a turf edger and for turf renovation.

Based on a large body of scientific data, the MAATF believes that the organic arsenicals do not pose an unreasonable risk to workers, farmers, the public or the environment when used according to label directions. The estimate of risk used by EPA in its risk assessments are not supported by actual measurement of environmental concentrations and exposures of organic arsenicals. Rather, the risks calculated by the Agency are based on unduly conservative risk modeling estimates of inorganic arsenic in water.

Members of the MAATF are basic manufacturers of the organic arsenical products and include Drexel Chemical Co. (APC Holdings), KMG-Bernuth, Inc., and Luxembourg-Pamol, Inc. These companies are global providers of products to the turf care and agricultural industries. For more information, contact the MAA Research Task Force, P.O. Box 33856, Washington D.C. 20033-0856, by telephone: (800) 890-3301, by fax: (202) 557-3836, or by e-mail meldan@luxpam.com.