



November 22, 2019

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Re: Docket ID No: EPA-HQ-OPP-2018-0763
Sodium lauryl sulfate; exemption from the requirement of a tolerance

Thank you for the opportunity to comment on the regulation which establishes an exemption from the requirement of a tolerance for residues of the fungicide and miticide sodium lauryl sulfate in or on all food commodities when used in accordance with label directions and good agricultural practices.

This letter is submitted on behalf of the members of the Association of American Pesticide Control Officials (AAPCO). AAPCO members represent the officials charged by law with the execution of the state, territorial, provincial, and federal laws in the United States, including all its territories, and in Canada regulating the production, labeling, distribution, sale, use, and disposal of pesticides.

AAPCO supports establishing an exemption from the requirement of a tolerance for residues of sodium lauryl sulfate in or on all food commodities when used in accordance with label directions and good agricultural practices. However, it will be a regulatory burden and create unnecessary paperwork to limit the exemption to when sodium lauryl sulfate is only used as a fungicide or miticide.

AAPCO is requesting that the final rule for § 180.1372 instead state, "Residues of sodium lauryl sulfate (CAS No. 151-21-3) in or on all food commodities are exempt from the requirement of a tolerance, when used in accordance with label directions and good agricultural practices."

Sincerely,

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