



Mr. William Diamond, Director
Field and External Affairs Division
EPA - Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Dear Mr. Diamond:

The purpose of this letter is to offer the National Pesticide Stewardship Alliance's (NPSA) support to the report [EPA Label Review Manual Revision: Pesticide Disposal Language Updates and New Challenges](#) recently completed the SFIREG Working Committee for Water Quality and Pesticide Disposal (WQ&PD) and provided to EPA.

NPSA, founded in 2000, is an organization of federal, state and local governmental agencies, educational and research institutions, public organizations, private corporations and individuals that are actively involved in different aspects of pesticide stewardship. We serve as a forum to facilitate cooperation among these entities. Our goals are to increase the effectiveness, efficiency and longevity of pesticide stewardship efforts.

Our alliance was actively involved in the discussions and deliberations in developing the aforementioned report and fully supports its recommendations. Not only did we have a member on the review team, but our membership had the opportunity to provide additional comments and guidance at our 2003 annual meeting in Tucson, Arizona through roundtable discussions led by Mr. Gary Bahr, review team leader. We cannot stress strongly enough the importance of the recommendations for changes to Chapter 13 of the EPA Pesticide Label Manual. The recommendations, particularly the removal of the *dispose on site* statement, bring pesticide disposal label statements into the 21st century and acknowledge that the protection of our environment is paramount.

On the issue of the open burning of pesticide containers, NPSA suggests that the EPA Pesticide Label Manual require labels take a proactive approach and direct end users to recycling programs and away from open burning. NPSA is piloting a cooperative project with Earth911 to place agricultural/commercial pesticide disposal information for all states on their web site as is currently done for household hazardous waste. In addition to any container disposal statements, directing end users to the Earth911 web site would provide them with current information on their states' disposal and recycling programs and state contacts for each.

In conclusion, we support the recommendations in the report and urge EPA to give this a high priority for action.

Respectfully submitted,

Mary Grodner, Chairman, Board of Directors
National Pesticide Stewardship Alliance

Gail Amos, President
National Pesticide Stewardship Alliance