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Subject: methyl iodide

Date: Tue, 03 Feb 2009 18:54:01 -0800

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To: jackson.lisa@epa.gov

February 3, 2009

Administrator Lisa Jackson
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Jackson,

As chemists and citizens, we are pleased to see the staff changes at EPA with the new administration and wish you the best in your new position.

We are writing to request your attention to the fumigant pesticide methyl iodide (iodomethane). In September of 2007, we and 52 other members of the National Academy of Sciences—six of them Nobel Prize laureates—wrote to Mr. Stephen Johnson with our concerns about the impending registration of the highly toxic chemical methyl iodide, especially with regard to its carcinogenicity, developmental toxicity, and propensity for off-site drift (see attached letter).

Assistant Administrator Jim Gulliford replied to our letter (also attached), but dismissed our concerns. Mr. Johnson organized a telephone conference, putatively for us to talk to him about our concerns. When the conference took place, he was not there. Lower level staff talked to us, in our perception not with great enthusiasm. Methyl iodide was given a one-year conditional registration less than a week later, and this registration was revised to be a time-unlimited conditional registration in the fall of 2008. The stated intent of the extension of the conditional registration was that staff is waiting for the new mitigations for the other fumigants to be finalized before finalizing the registration of methyl iodide. We attach an October 2008 article

from Chemical and Engineering News that nicely summarizes the history of the process, for your review. In light of the fact that this registration is still conditional, we are hoping you can reopen the matter in the near future.

The push for alternatives to the ozone-depleting methyl bromide has led to substitution of a chemical that is more toxic than methyl bromide in every way except for its effect on the ozone layer. We believe EPA can do better. With a citizen's and professional's concern, we urge you to take action in this matter.

Robert G. Bergman
Member, National Academy of Sciences
Gerald E. K. Branch Distinguished Professor