

# *Tidal Vision*

From the Ocean, for the Ocean.

Assistant Administrator, Alexandra Dapolito Dunn, Esq.  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
WJC East, Room 3130  
Mail Code: 7101M,  
Washington D.C. 20460

CC:

Director, Rick Keigwin  
Office of Pesticide Programs  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 7501P,  
Washington D.C. 20460

Via Certified Mail & Electronic Mail (Email)

Zach Wilkinson, COO  
Tidal Vision Products, LLC (submitters)  
5506 Nielsen Ave., Ste A  
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April 4, 2019

**AMENDMENT TO ADD CHITOSAN TO THE MINIMUM RISK PESTICIDE INERT  
INGREDIENT LIST AT THE SAME TIME AS ADDING CHITOSAN TO THE MINIMUM RISK  
PESTICIDE ACTIVE INGREDIENT LIST**

**Re: PETITION TO LIST THE MATERIAL CHITOSAN CAS # 9012-76-4 ON THE US EPA  
FIFRA MINIMUM RISK PESTICIDE LIST 40 CFR 152.25(f)**

Dear Assistant Administrator Dunn:

This letter is an amendment to the petition filed to the EPA in October of 2018 to add the substance commonly called chitosan, CAS # of 9012-76-4, to the EPA's Minimum Risk Pesticide Active Ingredient list.

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This purpose of this amendment is to request chitosan be added to the list of **inert** ingredients on the EPA Minimum Risk Pesticide List, 40 CFR Part 152.25(f), in addition to, and at the same time as adding chitosan to the Minimum Risk Pesticide Active Ingredient list.

There are many common applications of chitosan as an inert ingredient such as when used as an adjuvant along with a different active ingredient pesticides, where the active performs the pesticidal function and chitosan performs an inert function. In the interest of efficiency of time and the agencies limited resources, we request with that chitosan be added to both (Minimum Risk Active and Inert) lists at the same time, in order to avoid the use of additional resources by doing so in separate actions.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Zach Wilkinson". The signature is written in a cursive style with a large, stylized initial "Z".

Zach Wilkinson  
COO, Tidal Vision Products, LLC