January 11, 2021

Environmental Protection Agency Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001.

RE: Registration Review Draft Risk Assessments for Paraquat; Docket ID: EPA-HQ-OPP-2011-0855

On behalf of our grower members, the undersigned organizations appreciate the opportunity to comment on EPA's proposed interim decision for paraquat. The aerial use of paraquat is an important tool for our members. We request that the agency re-visit its decision to eliminate all aerial uses of paraquat other than cotton desiccation. Collectively, our members include applicators and growers who rely on aerially applied paraquat to control weeds and manage weed resistance. Based on additional data and mitigation measures submitted to EPA by the National Agricultural Aviation Association (NAAA), we believe that EPA can achieve its desired risk mitigation while still preserving critical aerial uses of the product.

Our organizations strongly disagree with EPA's proposal to eliminate nearly all aerial uses of paraquat except for cotton desiccation. The product has been applied by air safely and professionally for decades, as documented by EPA's incident database. At a minimum, eliminating aerial uses of the product would cause undue harm to soybean, sunflower, potato, rice, wheat, corn and dry bean growers across the country. EPA's data grossly understates the importance of aerially applied paraquat to our members. The importance of aerial applications has been documented by various sources including our own members, NAAA and state agricultural aviation associations, state pesticide regulatory agencies, university agricultural extension services, and agricultural crop consultants.

Further, EPA should use the more accurate and realistic Tier 3 model in AgDRIFT to model the drift from aerial applications. EPA's cited risks to bystanders and the environment are largely due to the use of an inaccurate model that does document aerial applications made in the U.S. today.

Finally, EPA can mitigate risks identified in the decision by undertaking the following mitigation measures:

- Requiring the use of closed loading systems and an elastomeric half facepiece cartridge respirator with mixing and loading paraquat for aerial applications;
- Banning the use of human flaggers for aerial applications of paraquat;
- Increasing the minimum droplet size required on the label for aerial use from medium to coarse (ASABE S572); and
- Basing the buffer zones distances in the proposal on wind direction, as already stated on paraquat labels.

Thank you very much for the opportunity to submit these comments. Paraquat is an important tool for growers in controlling weeds and managing weed resistance. We urge the agency to re-visit its decision to eliminate virtually all aerial uses of this product.

Sincerely,

Association of Washington Aerial Applicators
Council of Producers and Distributors of Agrotechnology
National Association of Wheat Growers
National Cotton Council
National Sunflower Association
Washington Friends of Farms & Forests
USA Rice