



Via Electronic Docket Submission

October 29, 2021

Mr. Edward Messina
Director, Office of Pesticide Programs
C/O Office of the Hearing Clerk
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: Objections to the Revocation of Chlorpyrifos Tolerances Final Rule (Docket No. EPA-HQ-OPP-2021-0523)

Dear Mr. Messina:

The California Citrus Quality Council (CCQC) represents the California citrus industry including approximately 2,000 growers and approximately 85 citrus packers on technical and regulatory issues domestically and overseas. The total annual farmgate value of California citrus production is \$2.3 billion, and the industry employs over 21,000 employees. We appreciate this opportunity to comment on the Environmental Protection Agency's (EPA) revocation of chlorpyrifos tolerances.

CCQC is a member of the Minor Crop Farmer Alliance (MCFA), which works to ensure that science is the fundamental principle for making pesticide policy decisions. CCQC would like to endorse the comments submitted by the Minor Crop Farmer Alliance (MCFA) on EPA's revocation of chlorpyrifos tolerances. Those comments provide detailed discussion on three major areas of concern, which include the use of epidemiology studies as support for not reducing the ten-fold uncertainty factor; EPA's decision not to maintain tolerances for eleven crops that meet EPA's safety standard and the need for the Agency to change the effective date of the tolerance revocations to accommodate the eleven safe uses and manage a more orderly sequence of review and revocation.

One of the eleven safe uses of chlorpyrifos is a granular formulation used to control ants in young citrus groves. This formulation is broadcast on the ground at the base of trees or in the protective sheaths of young trees to control ants. This is an important use that the citrus industry would like to maintain. EPA's analysis has shown that there is very little human exposure and virtually no risk of dietary exposure. Since there is no dietary exposure, we request that EPA maintain this use for California citrus producers.

CCQC appreciates the opportunity to submit these objections on this important issue. Please contact me if you have questions or need additional information.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JRCranney Jr". The signature is written in a cursive, somewhat stylized font.

James R. Cranney, Jr.
President