

Steve Kelley
2714 State Route 1181
Bardwell, KY 42023

October 21, 2021

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Formal Written Objections to Tolerance Revocations: Chlorpyrifos (EPA-HQ-OPP-2021-0523)

To Whom It May Concern:

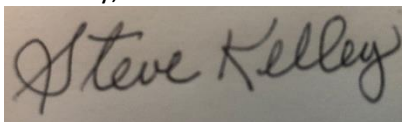
My name is Steve Kelley, and I am a soybean, corn, and wheat grower from Bardwell, KY. I am writing to object to EPA's revocation of the tolerances of chlorpyrifos. This insecticide is an important tool for my farming operations as well as for thousands of other growers across the country. Losing access to chlorpyrifos would significantly increase my costs of doing business, increase the vulnerability of my crops to pests, and reduce my ability to produce sustainably and steward the environment. I request EPA rescind its rule revoking tolerances and allow growers to continue to use this important tool.

Chlorpyrifos is an important insect management tool for growers. It helps to protect against a wide array of pests, including cut worms, army worms, grasshoppers, sting bugs, spider mites, and others. If left uncontrolled, these insect pests will result in double-digit yield losses and cause tens of thousands of dollars in crop damages. Growers need effective insect management tools, like chlorpyrifos, to protect their crops from these damaging pests. Many of these pests are not effectively controlled by other products currently on the market, which means growers may need two or more products to manage an insect pest currently controlled by chlorpyrifos. Not only will this increase my business costs and that of other growers by hundreds to tens of thousands of dollars annually in additional product purchases, but it means I will have to use a greater volume of pesticides to control insect pests. It will also likely increase the number of tractor passes I and others must make to apply chemicals, increasing fuel and water use, and reducing our ability to steward the environment and our natural resources.

Additionally, by losing access to chlorpyrifos, the remaining insect management tools growers have will increasingly have reduced effectiveness. Insects and other pest populations over time develop resistance to tools growers have to control them. To prevent the development of resistance, growers rotate or mix chemistries that control pests through different biochemical modes of action. However, by taking away an important tool, it gives growers fewer unique tools to control insects, meaning pests will more quickly develop resistance to remaining tools and expose growers to economic damage.

To lose access to chlorpyrifos would greatly harm my farming operations and those of others by thousands to tens of thousands of dollars annually and reduce our ability to be good environmental stewards. I object to the revocation of these tolerances and urge EPA to rescind this rule.

Sincerely,

A rectangular box containing a handwritten signature in black ink that reads "Steve Kelley".

Steve Kelley