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March 1, 2020

Office of Pesticide Programs Regulatory Public Docket
Environmental Protection Agency Docket Center, (28221T)
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

Re: EPA-HQ-OPP-2013-0266

Dear Office of Pesticide Programs:

Thank you for the opportunity to provide comments regarding the January 2020 Environmental Protection Agency (EPA) Preliminary Interim Decision (PID) for atrazine, propazine, and simazine. The Illinois Corn Growers Association (ICGA) represents the interests of the thousands of corn farmers in Illinois who routinely utilize atrazine to manage weeds and employ conservation practices on their farm.

Most importantly, ICGA values the use of sound science. We respectfully ask EPA to evaluate high quality studies in the ecological risk assessment and give them higher weight than outdated, misleading research. Several antiquated fish, bird, and amphibian studies remain in the PID. These should not be given the same merit as those extensive, replicated studies exhaustively evaluated in relevant peer-reviewed publications.

Secondly, ICGA is concerned about the community-equivalent level of concern (CE-LOC) range of 1.9 to 26 ppb provided in the PID. While the updated LOC of 15 ppb over a 60-day rolling average is a vast improvement over the 2016 assessment, providing a range for the CE-LOC is ambiguous. When EPA announces 15 ppb, the standard should be 15 ppb overall. Any deviation would be met with extreme opposition.

ICGA is grateful for the updated LOC of 15 ppb. This represents an opportunity for corn farmers to continue utilizing atrazine on their farms. As you may know, atrazine is critical for farmers who are using innovative conservation practices to minimize tillage on their farms. Because farmers have access to atrazine and can employ conservation tillage methods, they have lessened runoff of water, soil, nutrients, and pesticides, preventing erosion and protecting aquatic ecosystems and water quality. These methods also allow for a reduction in greenhouse gas emissions.

Thank you for the opportunity to comment on the PID for atrazine, propazine, and simazine.

Sincerely,

A handwritten signature in blue ink that reads "William L. Leigh".

William L. Leigh, President

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