



521 E Locust Street, Suite 220
Des Moines, IA 50309-1939
(515) 244-1194
www.iowafarmersunion.org

July 11, 2014

SUBMITTED ELECTRONICALLY

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

RE: Docket No. EPA-HQ-OPP-2014-0219; Pesticides: Consideration of Volatilization in Pesticide Risk Assessment

Dear Sir or Madam:

Board of Directors
President Jana Linderman,
Cedar Rapids
Vice President Thomas Burkhead,
Des Moines
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John Gilbert, *Iowa Falls*
Sally Gran, *Nevada*
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Marvin Shirley, *Minburn*
Anthony Thompson, *Elkhart*
Donna Winburn, *Grinnell*

On behalf of the members of the Iowa Farmers Union (IFU), thank you for accepting our written comments regarding the draft guidance documents prepared by the U.S. Environmental Protection Agency's Office of Pesticide Programs (OPP), to more fully incorporate consideration of volatilization drift into pesticide risk assessments:

- *Human Health Bystander Screening Level Analysis: Volatilization of Conventional Pesticides;*
- *Appendix A: Volatilization Screening Tool Guidance Document;* and
- *Appendix D: Registration Review Chemical Volatilization Screening Analysis Results.*

The Iowa Farmers Union is the oldest farm organization in the state of Iowa. Our family farmer members represent a diverse mix of farming types, including conventional corn and soybean farms, livestock and dairy operations, organic farms, and direct market fruit and vegetable operations.

Many of our conventional commodity farmers rely on commercial pesticides as a standard part of their farming operations, and we recognize the integral role of responsibly deployed pesticide technology in modern production agriculture. At the same time, our membership includes an increasing number of organic farmers, specialty crop producers and direct market fruit and vegetable farmers whose operations are vulnerable to significant damage from off-site pesticide spray drift and volatilization drift. In 2013, there were nearly 800 certified organic farms in Iowa, a number that has grown substantially over the past decade. Many of our beginning farmers in particular rely on high-value organic, fruit and vegetable, and specialty crops that allow them to begin new farming operations on a relatively small number of acres of increasingly expensive Iowa farmland. In addition to our real concern for the health of our farm families working in proximity to these chemicals, the economic viability of the family farm depends on OPP setting standards for the approval of pesticides and pesticide use that protect the diversity of our system of agriculture.

Comments of Iowa Farmers Union
Docket No. EPA-HQ-OPP-2014-0219

We strongly support the efforts of OPP to more fully assess and consider the impacts of volatilization drift as an integral part of pesticide risk assessments. Instances of pesticide spray drift can and do occur even where the applicator has made a reasonable effort to follow the requirements of the pesticide label. Volatilization drift is particularly challenging for applicators to prevent, as the risk of volatilization depends not only on conditions at the time of application, but also on conditions such as temperature, humidity and wind speed after the pesticide has been applied. Iowa farmers have seen the negative ecological and economic impacts of volatilization drift first hand, notably with the devastating impacts to the grape growing industry resulting from volatilization drift from applications of 2,4-D.

Including an assessment of volatilization drift in all pesticide risk assessments is an essential step in assuring that all registered pesticides meet the statutory standard of “no unreasonable adverse effects.” OPP is right to treat human health and inhalation risk as the primary consideration in this assessment. As a farm organization, IFU prioritizes the safety of our farm families and farm workers in a work environment that often includes a number of high risk activities, including exposure to toxic chemicals. However, it also is important for OPP to also assess risk to ecological resources, including neighboring crops that may be particularly sensitive to damage from volatilization drift.

As more of Iowa’s conventional commodity production is inter-mixed with small parcels of organic, fruit and vegetable, and specialty crops, we have witnessed a greatly increased need for improvements to the rules and best management practices for pesticide use that will allow a more diverse mix of farming operations to exist and thrive side-by-side. Even a modest amount of off-site spray drift can cause catastrophic damages, including losses to the current crop, loss of organic certification, loss of business reputation with local consumers, and potential health impacts for the farm family and farm workers. We have received reports from farmers, faced with both economic losses and negative health impacts from multiple instances of off-site spray drift, who have been unable to continue farming. Because volatilization drift is particularly hard to prevent at the time of application, it is essential that this category of risk be fully analyzed and mitigated as part of the pesticide registration process, before a pesticide is approved for widespread use on farms.

We strongly urge OPP to finalize the volatilization screening tool and move quickly to incorporate the screening tool into all pesticide risk assessments.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.M. Linderman', with a long horizontal flourish extending to the right.

Jana M. Linderman
President