DEPARTMENT *of* AGRICULTURE
STATE OF MISSOURI
JEFFERSON CITY
Serving, promoting and protecting the agricultural producers, processors and consumers of Missouri's food, fuel and fiber products.

JEREMIAH W. (JAY) NIXON
GOVERNOR

RICHARD FORDYCE
DIRECTOR

December 1, 2016

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460-0001

Re: ***Request for Extension to Worker Protection Standard Implementation Timeline***

Dear Administrator McCarthy:

The Missouri Department of Agriculture (MDA) requests the U.S. Environmental Protection Agency (EPA) extend the implementation of all revised provisions of the Agricultural Worker Protection Standard (WPS) (40 CFR 170, as published in the Federal Register on November 2, 2015) until January 2, 2018 or until EPA has: (1) finalized and delivered adequate enforcement guidance, educational materials, and training resources to the state lead agencies (SLA); and (2) provided the SLAs the tools and financial resources necessary to effectively implement the rule changes and assist the regulated community with compliance activities.

Agriculture is the backbone of Missouri's economy. Preserving the nearly 28 million acres of Missouri farmland is a top priority at MDA as we work diligently to protect and serve our producers and consumers across the state.

As the state lead agency, MDA is responsible for administering, implementing and enforcing federal and state pesticide regulations to approximately 31,000 certified Missouri pesticide applicators and to thousands of noncertified pesticide applicators. The revised WPS provisions will affect the bulk of our applicators and in order to accomplish successful implementation of the final rule changes, we need sufficient financial resources along with training materials, enforcement guidance, and compliance materials.

We are less than one month from the proposed compliance deadline of January 2, 2017, and many of the necessary educational materials have not been updated to include the 2015 provisions. Therefore, MDA strongly urges EPA to extend the implementation deadline to January 1, 2018, to allow EPA to finish and distribute educational resources and to allow regulators sufficient time for outreach and education.

If you have any questions, please don't hesitate to contact me.

Sincerely,

Richard Fordyce
Director

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