Drexel

Drexel Chemical

Company April 26, 2021

Docket Number EPA-HQ-OPP-2008-0850

Attn: Dana Friedman
Branch Chief -RMIB-I
Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency

Subject: Chlorpyrifos critical use continuance for Drexel Chemical Co.

Dear Ms. Friedman:

Thank you and your team for taking time to discuss the recent PID and some of the applications the agency feels can and should be retained. We concur with many of the use sites as they are important to Drexel and our continuance to provide producers with very useful liquid and granular formulations for them to protect and produce much our nations food supply. You mentioned to us the use of FQPA Safety factor for determining several of the commodities you feel should be retained for future Chlorpyrifos use for insect and vector control.

As I explained I am not as versed in the use of the FQPA Safety factor in risk determination, but I do remember when FQPA came about back in late nineties . I remember it amended FIFRA, established some guidance and as well gave EPA a way to establish a tolerance for pesticides that are deemed safe and present no reasonable harm from exposure to pesticide residue. It amended FIFRA's registration standard for food use pesticides as well by placing into the statue to include a reasonable certainty of no harm from pesticide. If I recall aggregate exposure was big component of FQPA if I remember, as was epidemiology studies for the agency in making some determinations regarding safety margins. I remember that EPA has discretion to apply a different margin of safety if there is more current reliable data to support a new or different margin of safety.

In discussion with the other registrants and our review a few months ago of WOE for use on this subject , we came to to the same determination as the agency did on page 41 of the recent PID that all labeled chlorpyrifos use can be retained nationwide at the 1X FQPA safety factor except for 1.) peppers, 2.) trash bins, and 3.) wood treatment. We concur.

I do understand that there much more recent data submitted to the agency for its use that was not reviewed prior to this PID issuance . But as stated above the agency has the authority to revise a safety margin when it has more current and reliable data at its disposal. In this case as I see FFDCA does not support a 10X safety factor in the absence of valid and reliable data. Corteva, ADAMA an Gharda pointed out in their comments on Feb. 3, 2021.

Furthermore, the weight of scientific evidence provided by epidemiology and laboratory animals deemed them being unresolved is more than uncertain when it comes to a Safety factor and does not warrant the agency placing a 10X FQPA safety factor on this pesticide.

Moreover, as previously mentioned , a more recent 21-drinking water study submitted to the agency in December 2020 strongly confirms the use of FQPA 1X safety factor for all crops and accepted use sites. This study as we

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327
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understand it, clearly shows the cause and the support for the use of 1 X FQPA safety factor when it comes to the use of Chlorpyrifos on all the crops listed in the PID:

- Alfalfa
- Apple
- Asparagus
- Cherry
- Citrus
- Corn
- Cotton
- Pecan
- Peach

continued use on sugar beets, soybeans peanuts , sorghum as well as all other labeled uses.

We are not so concerned about many of the non-ag use (perimeter sprays around building, or non-residential turf, road medians, warehouses, or industrial uses) but it is very important to commercial nurseries and orchards.

We hope this is useful and helps explain any questions. If you do have any more questions or need further assistance please do not hesitate to contact me at space@drexchem.com.

Best regards,

Ex. 6 Personal Privacy (PP)

Scott A. Pace
Director Registration Division
Drexel Chemical Company

cc: Patricia Biggio: Chemical Review Mgr. (PRD/OPP/USEPA)
Mandy Styles: EPA Registration Mgr.

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