



August 8, 2022

Anna Romanovsky  
Pesticide Re-Evaluation Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW,  
Washington, DC 20460-0001

*Submitted electronically via Regulations.gov*

**RE: Comments: EPA-HQ-OPP-2022-0490; Petition To Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses**

Dear Ms. Romanovsky;

The Association of American Pesticide Control Officials (AAPCO) appreciates the opportunity to comment on the *Petition To Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses*. Given the number of active ingredients included in the petition, and the associated request for information, we do not believe the comment due date of August 11, 2022 provides sufficient time for AAPCO and its members to review and provide meaningful comments on the petition.

The petition includes a request that the Agency revoke all tolerances and cancel all associated registrations for food uses of the following organophosphate pesticides (OPs): Acephate, Densulide, Chlorethoxyfos, Chlorpyrifos-methyl, Diazinon, Dichlorvos, Dicrotophos, Dimethoate, Ethoprop, Malathion, Naled, Phorate, Phosmet, Terbufos, and Tribufos. Given the wide use of these pesticides in agriculture, the implications of the requested revocation and cancellation actions would be significant. Additional time is necessary for states to consider and provide information related to their use, which should be considered prior to any decision by EPA.

The petition also includes a request that the Agency take actions to protect workers from potential risks of exposure to OPs, update its risk assessments to include a protective regulatory endpoint for children, and complete registration review on the OP class of chemicals by October 1, 2022. AAPCO considers the protection of all workers from risk of exposure a priority and supports the EPA in the registration and registration review processes. Twenty (20) OPs are currently undergoing registration review. The current 30

day comment period is not sufficient to provide comments on the current risk assessments and any actions needed.

AAPCO is committed to the protection of human health and the environment while ensuring the availability and legal use of pesticides. We are requesting the comment period be extended an additional 90 days to allow for review and submission of relevant and substantial comments to the petition.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Liza Fleeson Trossbach". The signature is written in a cursive, flowing style.

Liza Fleeson Trossbach

AAPCO President

Virginia Department of Agriculture and Consumer Services