



May 15, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Docket EPA-HQ-OA-2017-0190

Dear Administrator Pruitt:

Thank you for the opportunity to provide comments for the EPA's request for information on re-evaluating existing regulations, Docket number: EPA-HQ-OA-2017-0190. The National Association of Wheat Growers (NAWG) is a federation of 21 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research and sustainability.

NAWG has provided comments on several EPA proposed regulations as an individual organization and as a member of several coalitions or joint efforts over the past few years. We are pleased to highlight several regulations that we believe deserve re-evaluation and support the broader agriculture community comments that are also submitted to this docket that provide additional details regarding these regulations (NAWG is a signatory on that letter).

Waters of the United States. The Waters of the US expanded the scope of waters that were to become jurisdictional under the Clean Water Act, impacting large agriculture geographies such as the prairie pothole region. The regulation did not provide clarity to growers to be able to determine which waters would be jurisdiction, and we believe it added to the ongoing confusion across the countryside about the reach of the Clean Water Act. NAWG believes this regulation should be rescinded.

Spill Prevention Control and Countermeasure (SPCC): NAWG members are concerned about the requirements for on-farm fuel storage and mitigation plan requirements. NAWG supports exemption of on-farm storage from the SPCC regulation.

Worker Protection Standards (WPS): Worker protection standards and regulations impacting the application of pesticides should be constructed in a way that are feasible for growers to understand and implement. On-farm safety is a priority for growers, but over burdensome requirements that are not feasible for farmers to implement or compromise confidential farming information should be revised.

Additional Clean Water Act Regulations: Actions by EPA to address wetlands, prior converted cropland, normal farming activities and TMDLs should be consistent with legislative intent and allow for state management of waters within their borders.

National Ambient Air Quality Standards (NAAQS): NAAQS should take into consideration cultural and common regional management practices such as burning of crop residue. Considerations should also be provided for dust on farming operations and farmers should not be found out of compliance with NAAQS due to circumstances beyond their control.

Thank you for allowing NAWG to provide comments on impact of EPA regulation on farming operations and provide recommendations on areas for revision and improvement. We look forward to working with you on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schemm", with a long horizontal line extending to the right.

David Schemm
President
National Association of Wheat Growers