August 19, 2003

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US Environmental Protection Agency
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1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

The USDA Western Region Pest Management Center is providing the following information in response to the questions that you asked regarding the use of dimethoate on succulent bean and pea crops. This response represents the six-state region of Alaska, Idaho, Oregon, Montana, Utah, and Washington. The three questions you asked were:

1) Would dimethoate still be used on succulent beans and peas if the PHI were increased to 30 days?
2) Would growers still be able to use it if the label carried a 30-day PHI and only ground applications were allowed?
3) Is dimethoate use alternated with imidacloprid for aphid resistance control on succulent peas and beans?

Question 1: Would dimethoate still be used on succulent beans and peas if the PHI were increased to 30 days?

Answer: No. A 30-day PHI for dimethoate for succulent beans and succulent peas is untenable for growers; however, growers agree that a 14-day PHI would allow for continued use of dimethoate on these crops.

In succulent bean production, dimethoate is used for both aphid and lygus control. If growers require a second application for lygus control, this spray is applied 20 days preharvest. In succulent pea production, dimethoate is used for aphid control in podded peas and for both aphid and thrips control in sugar snap peas. For podded peas in our region, dimethoate is applied anywhere from 14 to 30 days before harvest. The case of sugar snap peas is a bit different. Here the primary dimethoate use is for the control of thrips. When thrips are not adequately controlled, the insects sting the pea pods and the resulting cosmetic damage makes the peas unmarketable. In sugar snap peas dimethoate is applied in a split application. The first application is made 30 days preharvest when the crop is at 25% bloom. Two weeks later, at 15 days preharvest, a second, lighter application is made. Just this spring Warrior (lambda-cyhalothrin) became available for growers to use for the control of thrips in sugar snap peas. While some of the growers in our area have switched to this chemical, we feel it is important to also retain the use of dimethoate for thrips control. Growers of both succulent beans and succulent peas have indicated that while a 30-day PHI is not feasible, they would support a 14-day PHI.
Question 2: Would growers still be able to use dimethoate if the label carried a 30-day PHI and only ground applications were allowed?

Answer: No. The 30-day PHI is problematic for the reasons stated above and, while there is some ground dimethoate application in our region, the majority of the dimethoate used on succulent beans and peas must be aerially applied.

In both succulent bean and succulent pea production, aerial application is very important in the areas where dimethoate is used. Aerial application is necessary where furrow irrigation is employed, because ground application equipment requires the ground to be somewhat dry and leaving irrigation off long enough to dry the ground (about 7 days) damages the crop at this stage of its development. Further, dimethoate is often applied after row closure occurs; driving ground equipment through the fields after row closure damages the plants and results in yield losses. Using ground application equipment to make dimethoate applications in succulent pea fields would lead to an estimated 20% yield loss.

Question 3: Is dimethoate use alternated with imidacloprid for aphid resistance control on succulent peas and beans?

Answer: No. In our area imidacloprid is not commonly alternated with dimethoate in succulent bean and pea crops.

I hope that the above information will be helpful. Both a 14-day PHI and aerial application of dimethoate are important issues, particularly to the succulent pea producers in our area. I would be happy to provide you with any additional information that you might need or you may contact the individuals listed on the attached contact sheet.

Sincerely,

[Signature]

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Washington State University Tri-Cities
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### Contact List for Dimethoate Use on Succulent Beans & Peas

<table>
<thead>
<tr>
<th>Crop/Usage Site</th>
<th>Last Name</th>
<th>First Name</th>
<th>Organization</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>succulent beans</td>
<td>Knudson</td>
<td>Chris</td>
<td>Twin City Foods</td>
<td>(509) 962-9806</td>
</tr>
<tr>
<td>succulent beans</td>
<td>Gill</td>
<td>Jim</td>
<td>Norpac Foods</td>
<td>(503) 769-2101</td>
</tr>
<tr>
<td>succulent peas</td>
<td>Knudson</td>
<td>Chris</td>
<td>Twin City Foods</td>
<td>(509) 962-9806</td>
</tr>
<tr>
<td>succulent peas</td>
<td>Nelson</td>
<td>Stan</td>
<td>Twin City Foods</td>
<td>(360) 629-2111</td>
</tr>
<tr>
<td>succulent peas</td>
<td>Fickett</td>
<td>Bill</td>
<td>Symons Frozen Foods</td>
<td>(503) 860-5869</td>
</tr>
<tr>
<td>succulent peas</td>
<td>Gill</td>
<td>Jim</td>
<td>Norpac Foods</td>
<td>(503) 769-2101</td>
</tr>
<tr>
<td>sugar snap peas</td>
<td>Boob</td>
<td>Ed</td>
<td>Hush &amp; Hush Fertilizer Co.</td>
<td>(509) 728-5555</td>
</tr>
<tr>
<td>sugar snap peas</td>
<td>Walsh</td>
<td>Doug</td>
<td>Washington State University</td>
<td>(509) 786-6927</td>
</tr>
<tr>
<td>sugar snap peas</td>
<td>Lupo</td>
<td>Annette</td>
<td>JR Simplot</td>
<td>(509) 787-4521</td>
</tr>
</tbody>
</table>

* n/a - Western Region IPM Center State Liaisons/Representatives
  - Blodgett, Sue - Montana State University (406) 994-2402
  - Daniels, Catherine - Washington State University (509) 372-7495
  - Deer, Howard - Utah State University (435) 797-1602
  - Hirnyck, Ronda - University of Idaho (208) 364-4046
  - Jahns, Tom - University of Alaska Fairbanks (907) 262-5824
  - Jenkins, Jeff - Oregon State University (541) 737-5993