

**PNW Comment Coordinator
FY 05 Annual Report
July 1, 2004 to June 30, 2005**

Since September 2002 the Pacific Northwest (PNW) Workgroup (Alaska, Idaho, Montana, Oregon, Utah, and Washington) of the Western Integrated Pest Management Center (WIPMC) has submitted joint responses to USDA and EPA information requests. The WIPMC funds the PNW Comment Coordinator, a half-time position, to gather the requested information on behalf of the PNW Workgroup, oversee information review, and submit comment packages to either USDA or EPA. This report summarizes the activities of the PNW Comment Coordinator for FY05. While the FY05 comment projects are summarized here, note that background information on the program, individual information requests, and the resulting PNW response packages are posted on WSU's Pest Management Resource Service web page at: <http://wsprs.wsu.edu/USDAEPAInfo.html> .

PROGRAM RELEVANCE

EPA has recently acknowledged the importance of stakeholder input into the process of pesticide reregistration. In the July 13, 2005, Federal Register EPA presented its proposed approach to a new pesticide registration review program. The program would result in the review of active pesticide registrations on a 15-year cycle. In discussing the review process, EPA stated that one of the lessons learned from the current reregistration program concerned the value of stakeholder input and public participation:

“...the Agency found value in consulting stakeholders before beginning a reregistration review. In particular, such consultation clarified use practice and usage patterns and identified uses that were no longer economically viable. As a result, the Agency was able to reduce the amount of effort and rework required to complete a reregistration eligibility decision....Although the public participation process adds to the time frame for making reregistration decisions, particularly in complex or controversial cases, the process leads to better decisions and more efficient use of Agency resources.”

FEEDBACK

The PNW Workgroup's program of consolidating responses to USDA/EPA information requests is now in its third year and it continues to receive favorable comments from both professionals involved in agriculture in the PNW states and from regulators. Over the past year the following program feedback has been received:

- “Thanks for all your good work.... Everybody that sees your work at EPA and here at USDA is impressed with its completeness, thoroughness, and presentation. Your work is a model for others to emulate.” (USDA)
- “EPA did say they were especially impressed as usual with the thoroughness and professionalism of [the] comments concerning the PNW.” (USDA)

- "...EPA's Branch Chief said that the comments provided by the Western Region IPM Center specifically Washington State University - Tri-Cities [the PNW Comment Coordinator] and the Southern Region IPM Center, specifically Oklahoma State, were key in their decision..." (USDA)
- "We especially appreciate the way you listed worker activities because the re-entry risk varies depending on the amount of worker contact with treated foliage etc. If we know what the workers are doing, we can group the activity in the appropriate risk category, and set the REI accordingly. (The REIs we initially proposed were all based on high contact, therefore high risk, activities.)" (EPA)
- "Excellent malathion information from the Pacific Northwest." (USDA to EPA)
- "Many thanks. Yours and Rick Melnicoe's efforts have been the best information received thus far. EPA will be very grateful. So are we." (USDA)
- "Many thanks for your excellent work in 2004 - 2005. The chlorsulfuron comments were particularly singled out by EPA as being especially informative and resulted in risk management decisions that were advantageous to PNW growers and growers nationwide." (USDA)
- "Thank you for all your hard work.....it makes a BIG difference." (USDA)
- "On behalf of the wheat growers in Idaho I'd like to thank you for your efforts in gathering the information and getting comments into EPA." (Idaho Wheat Commission)
- "Thank you...for getting me this information so quickly." (USDA)
- "Very nice job on this letter. I think it captures the essence of our concerns very nicely." (Utah State University)
- "Thank you for your efforts on behalf of PNW pear producers." (Oregon State University)
- "You are great! Good work on this one." (Utah State University)
- "... – really good letter on the chlorsulfuron response – hope it works –..." (Washington State University)
- "Thank you...for the outstanding response, very well done. I only wish more people would take the time to respond to this questionnaire." (USDA)

FY05 ACTIVITY SUMMARY

The following is a summary of the activities of the PNW Comment Coordinator for the past year and provides a status report on a total of 21 projects. This list is comprised of 4 projects that commenced in FY04 but that were completed in FY05; 16 projects undertaken and completed in FY05; and one project that was started in FY05 and that completed in FY06. The projects below are presented in order by project number and hence fall in chronological order. Note that one of the items summarized was actually three requests concerning the herbicide cycloate, all of which arrived during a brief period in September of 2004.

Project Name	Malathion Label Information
Project Number	2004-4
Crops	caneberries, blueberries, strawberries, cherries, trees grown for pulp, grain storage bin treatment, mint, parsnip, rutabaga, turnip, pasture, rangeland
Start Date	6/2/04

Project Name	Malathion Label Information - Continued
Project Number	2004-4
End Date	7/16/04
Purpose	EPA requested information on specific malathion labels for which uses in production agriculture (uses and/or use rates) are important.
Comment Summary	The PNW Workgroup provided information on the use of malathion on caneberries, blueberries, strawberries, cherries, trees grown for pulp, grain storage bin treatment, mint, parsnip, rutabaga, turnip, pasture, and rangeland. We also provided lists of the current malathion registrations for each of the six PNW Workgroup states.
Results	EPA reviewed the data submitted from the PNW and used it to determine which uses were most critical to growers. The revised risk assessment is due out in early September.

Project Name	Ferbam: Use in the PNW
Project Number	2004-6
Crops	n/a – Chemical not registered in any of the six PNW states.
Start Date	6/22/04
End Date	7/15/04
Purpose	USDA requested input on Taminco's proposal to discontinue support for ferbam use on apples, caneberries, cherries, grapes, pears, and ornamental and forestry.
Comment Summary	Ferbam is not registered for use in any of the six PNW Workgroup states; however, the cranberry industry would be interested in using ferbam if Taminco would register it for use in Oregon and Washington.
Results	n/a

Project Name	Endothall: Use in Irrigation Ditches
Project Number	2004-7
Crops	irrigation canal
Start Date	6/22/04
End Date	7/20/04
Purpose	EPA has asked if endothall is used in irrigation canals.
Comment Summary	Endothall is not being used in irrigation canals in the six PNW Workgroup states.
Results	n/a

Project Name	Captan: Three Use Questions
Project Number	2004-8
Crops	ornamentals, turf
Start Date	6/23/04
End Date	7/30/04
Purpose	EPA was attempting to resolve captan labeling issues and asked what activities took place in ornamentals that required access during the REI and what maximum use rate is needed on turf. They also asked for input on eye wash station location.
Comment Summary	Ornamentals – Captan use for propagation; container, bare root, and tuber disease control; and Easter lily bulb dip uses were described. Turf – no captan turf use was reported. The PNW states also provided feedback on eye wash station location.
Results	As of February 2005 EPA had not issued a formal captan decision. They have shared some of the planned label amendments with USDA and, based on this, it appears that EPA has accepted some comments and not others.

Project Name	Captan: Strawberry Field Size
Project Number	2004-9
Crops	Strawberry
Start Date	7/19/04
End Date	7/23/04
Purpose	USDA asked if EPA's estimate of 350 acres for the average size of a strawberry field was correct.
Comment Summary	The average field size for PNW strawberry fields is between 10 and 20 acres.
Results	The information supplied to USDA was sent onto the Health Effects Division (HED) of EPA to be used in recalculating worker Margins of Exposure (MOE).

Project Name	Cycloate: Chemigation
Project Number	2004-10
Crops	sugarbeet, sugarbeet seed, table beet, table beet seed, spinach, spinach seed
Start Date	7/28/04
End Date	8/4/04
Purpose	EPA would like Helm Agro to drop the cycloate chemigation directions from the label and Helm Agro asked if anyone was using this application method.
Comment Summary	Cycloate is not applied by chemigation to crops in the PNW.
Results	Helm Agro has informed EPA that they wish to voluntarily cancel chemigation use of cycloate and they will remove these instructions from future labels.

Project Name	Cycloate: Three Follow-up Questions
Project Number	n/a
Crops	sugarbeet, sugarbeet seed, table beet, table beet seed, spinach, spinach seed
Start Date	9/1/04, 9/1/04, 9/17/04
End Date	9/1/04, 9/7/04, and 9/24/04
Purpose	In the first half of September 2004, EPA asked a series of short follow-up questions about cycloate use and proposed mitigation measures.
Comment Summary	PNW responses provided information regarding applying cycloate to fertilizer and broadcast applying the treated fertilizer; the average size of Montana sugarbeet fields; and the feedback that growers would support a requirement for enclosed cabs but would not be able to tolerate a proposed 48-hour REI.
Results	Information submitted to EPA was used with mixed results in the formulation of mitigation measures outlined in the RED. These mitigation measures included extending the REI to 48 hours; requiring the use of enclosed cabs and closed mixing/loading systems; and prohibiting on-farm impregnation of cycloate onto dry bulk fertilizer.

Project Name	Thiram Use/Benefit Questionnaire
Project Number	2004-11
Crops	arugula seed, basil seed, beet seed, broccoli-raab seed, cabbage seed, carrot seed, Chinese cabbage seed, collard seed, coriander seed, dill seed, India mustard seed, kale seed, kohlrabi seed, parsley seed, parsnip seed, radish seed, rutabaga seed, spinach seed, Swiss chard seed, turnip seed, onion, sugarbeet, and wheat
Start Date	8/9/04
End Date	8/19/04
Purpose	Using a questionnaire that had been reviewed by EPA, USDA asked for thiram use/benefits information on several crops in four states.

Project Name	Thiram Use/Benefit Questionnaire – Continued
Project Number	2004-11
Comment Summary	Thiram is an important seed treatment in the crops listed above.
Results	Mitigation decisions by EPA were guided by agricultural benefits and practices as described by USDA based on submitted comments. Use and usage information was used by EPA in calculating risk and determining mitigation plans. The final RED has not been published, but the closure call for thiram indicated that seed treatments would be retained with some limits on planting depth. Strawberry and apple uses will be cancelled. Forestry and lily bulb uses will be retained and repellency uses will be retained with some limitations.

Project Name	Herbicide Use on CRP and Rangeland
Project Number	2004-12
Crops	CRP land, rangeland
Start Date	8/30/04
End Date	9/24/04
Purpose	USDA requested information about herbicides used on CRP and rangelands.
Comment Summary	We provided state use information about herbicides used on both CRP and rangeland.
Results	USDA sent this information to EPA to support the sulfonylurea herbicide reregistration process. According to USDA, EPA used the information to recalculate the risk assessment resulting in successful reregistration.

Project Name	Section 18 Process – Proposed Changes
Project Number	2004-13
Crops	n/a
Start Date	9/14/04
End Date	1/29/04
Purpose	EPA solicited comments on proposed changes to the Section 18 process.
Comment Summary	Comments were submitted stating that for repeat exemption requests, applicants should be able to recertify that an emergency condition exists for five years rather than three as proposed. We also asked that EPA allow Section 18s to be issued based on the need for alternative chemistries to prevent resistance development.
Results	EPA expects to issue the final rule on the proposed changes to the Section 18 process in January 2006. At this point in the rulemaking process EPA personnel may not comment on the progress of the rule revision.

Project Name	Chemigation
Project Number	2004-14
Crops	n/a
Start Date	9/23/04
End Date	10/11/04
Purpose	USDA requested information via a questionnaire regarding common chemigation practices.
Comment Summary	Information was supplied to USDA regarding general chemigation practices in Washington and Idaho.
Results	The information was submitted to the Agricultural Handlers Exposure Task Force (AHETF) which is charged with generating a database of exposure to agricultural workers who mix, load, and apply pesticides. The study designs need to reflect the types of equipment and practices that are commonly in use. The data from the chemigation survey will be used in designing exposure study protocols for implementation by the AHETF.

Project Name	Chlorsulfuron
Project Number	2004-15
Crops	Wheat
Start Date	9/24/04
End Date	10/29/04
Purpose	USDA asked for chlorsulfuron benefits information and for suggestions regarding mitigation measures.
Comment Summary	Comments submitted described the use pattern and the importance of chlorsulfuron on wheat grown in the PNW. We indicated that if EPA reduced the application rate or disallowed aerial application this would make chlorsulfuron unusable in PNW wheat.
Results	EPA did not lower the application rates. See also Project 2005-3.

Project Name	Simazine Use on Turfgrass
Project Number	2004-16
Crops	Turf
Start Date	11/30/04
End Date	12/6/04
Purpose	EPA requested USDA gather information on the use of simazine on turf - Is it commonly used? Where does use occur? Is use seasonal?
Comment Summary	Cool-season turfgrass is grown in the six PNW Workgroup states hence simazine is not used on turf in our region.
Results	n/a

Project Name	2,4-D: Typical Use Rates on Rangeland and Pastures
Project Number	2005-1
Crops	rangeland, pasture
Start Date	1/18/05
End Date	1/27/05
Purpose	USDA requested information on the typical use rates for 2,4-D on rangeland and pastures.
Comment Summary	Reported 2,4-D use rates of 0.5 to 2.0# ae/A in five of the six PNW Workgroup states. (No 2,4-D use information was available from Montana.)
Results	USDA submitted this information to EPA to support typical use rates of this herbicide. EPA used the information to revise the 2,4-D risk assessment. The RED was issued in August 2005.

Project Name	PCNB: Critical Uses
Project Number	2005-2
Crops	potatoes, ornamental bulbs, turf, ornamentals, garlic, onion
Start Date	1/28/05
End Date	2/23/05
Purpose	EPA requested that USDA provide information on the importance of PCNB on garlic, ornamentals, peppers, potatoes, succulent beans, soybeans, tomatoes, and turf.
Comment Summary	Comments were submitted on the use of PCNB on potatoes, ornamental bulbs, turf, ornamentals, garlic, and onion.

Project Name	PCNB: Critical Uses - Continued
Project Number	2005-2
Results	Comments from the PNW and many other universities were passed on directly to EPA and also utilized by USDA to understand and request that EPA give special consideration to the critical uses as expressed by the states. The final mitigation strategy has not yet been decided. EPA does plan to cancel some uses and amend others. According to USDA, EPA has found both USDA and state comments to be very helpful in focusing attention on other important uses in addition to those in cotton and turf.

Project Name	Chlorsulfuron: Mitigation Measures
Project Number	2005-3
Crops	Wheat
Start Date	4/12/05
End Date	4/21/05
Purpose	In the initial request, USDA asked for input on EPA's proposal to limit aerial application to helicopters only. With time EPA dropped this proposal and discussions then focused on EPA's proposal to require mandatory buffer zones.
Comment Summary	Comments were submitted on the problems that the imposition of mandatory buffer zones would cause as far as chlorsulfuron applications were concerned. The comments centered on problems with strip or divided slope cropping and problems with timing and product efficacy that would arise with the imposition of buffers.
Results	EPA has decided against the imposition of mandatory buffers.

Project Name	Chloroneb: Six Questions
Project Number	2005-4
Crops	sugarbeets, beans
Start Date	3/22/05
End Date	4/12/05
Purpose	EPA asked six questions related to the use of PPE and benefits associated with chloroneb use on sugarbeets, soybeans, cotton, and beans.
Comment Summary	Chloroneb is not used on the crops in question in our region.
Results	n/a

Project Name	Azinphos Methyl: Questionnaire
Project Number	2005-5
Crops	Brussels sprouts, parsley, nursery stock, walnuts
Start Date	3/21/05
End Date	4/12/05
Purpose	EPA asked for input, via a questionnaire, regarding azinphos methyl use on parsley, nursery stock, Brussels sprouts, almonds, pistachios, and walnuts.
Comment Summary	Of the listed crops, AZM is only used in our region on Brussels sprouts. A completed questionnaire was returned to USDA.
Results	The information was requested in order to learn which crops have a critical need for AZM and to try and prevent minor crops with critical needs from being dropped from the registration. No further information on the status of this project is available at this time.

Project Name	Tetrachlovinphos
Project Number	2005-6
Crops	poultry, livestock
Start Date	5/2/05
End Date	5/12/05
Purpose	USDA asked for information on the use of dust and WP formulations of tetrachlovinphos on poultry and livestock.
Comment Summary	Dust use remains important for cattle as an alternative to more expensive ear tags. Tetrachlovinphos is not widely used in poultry production in the PNW.
Results	USDA forwarded the information to EPA. EPA maintained certain poultry and livestock uses, however, the dust and paint formulations were canceled.

Project Name	Antibiotics: Oxytetracycline and Streptomycin
Project Number	2005-7
Crops	apples, pears, beans, nursery/ornamentals, potatoes
Start Date	5/19/05
End Date	6/9/05
Purpose	USDA asked for information on the use of oxytetracycline and streptomycin.
Comment Summary	Both oxytetracycline and streptomycin are used to control fire blight in apples and pears and these are viewed as critical uses. Streptomycin is used as a seed treatment in almost all bean crops planted in the PNW. There is some streptomycin use in the nursery and ornamentals industry in our region and while it is also labeled for use on potatoes as a seed piece treatment, its use is not common.
Results	According to USDA, EPA plans to use the information submitted by the PNW for the development of the preliminary risk assessment. This was a slightly unusual case in that EPA requested use information prior to developing the risk assessment. USDA is hopeful that this might result in a more realistic preliminary risk assessment.

Project Name	Mancozeb: Proposed Mitigation Measures
Project Number	2005-8
Crops	greenhouse grown cut flowers, cranberries, apples, Christmas trees, potatoes, sugarbeets, asparagus, grapes, turf
Start Date	6/29/05
End Date	7/22/05
Purpose	USDA asked for input on EPA's proposal to extend the REI for mancozeb on greenhouse grown cut flowers, cranberry, apples, Christmas trees, potatoes, sugarbeets, asparagus, cucurbits, tomatoes, and grapes.
Comment Summary	The PNW Workgroup provided input on EPA's proposed REIs for the listed crops. Apples and Turf: An REI extension to 48 hours is tolerable but nothing longer. Christmas trees and Sugarbeets: Extending the REI will not be problematic for PNW growers. Cranberry: Growers could tolerate a 48-hour REI but prefer that it remain at the current 24 hours. Potatoes: Growers ask that EPA retain the 24-hour REI.
Results	USDA provided the PNW information to both EPA's mancozeb CRM and the plant pathologist. The information was used during risk mitigation discussions with the registrant. At this point the TRED is still unsigned and negotiations are ongoing.