



January 30, 2007

Ref: 2007-3-1

Harold D. Coble, Ph.D., Agronomist
USDA/ARS/OA
Office of Pest Management Policy
1730 Varsity Drive, Suite 110
Raleigh, NC 27606

I am responding to EPA's second inquiry regarding overhead irrigation use of water treated with acrolein. In this request Bill Phillips asked about the lag time between acrolein applications and the harvest of apples and grapes grown in Oregon.

I made inquiries of the ten irrigation districts in Oregon that have NPDES permits. Of these ten districts only two reported minor apple production. No commercial grape production was reported in any of the ten districts I contacted. The Owyhee Irrigation District reported that there were several small apple orchards in their district and that one used sprinkler irrigation. This orchard was estimated to be approximately 10 acres and apples from this orchard are harvested at the end of October. Typically the Owyhee Irrigation District makes its last acrolein application in mid-September; thus, it is estimated that here at least six weeks elapse between a final acrolein application to irrigation water and apple harvest.

The West Extension Irrigation District also reported that one 12-acre organic apple orchard within their district is using overhead irrigation. Apples from this orchard are harvested in mid-September. In 2006 the West Extension Irrigation District made its final acrolein application the second week of August. For this district final acrolein applications are typically made late in August, never extending beyond the end of August. The West Extension Irrigation District reported that in 2006 there was a five week period between their final acrolein application and the harvest of apples from this orchard; however, in any give year, three weeks would be more typical. The irrigation district manager reported that irrigation personnel shut off the headgate for this grower when they are treating the canal with acrolein. This prevents treated water from reaching the grower's irrigation pond.

I have attached a contact list for your use should you have further questions. Thank you for the opportunity to provide this information.

Sincerely,

Jane M. Thomas

Jane M. Thomas
Pacific Northwest Coalition Comment Coordinator
Washington State Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99354
phone: 509-372-7493 fax: 509-372-7491
e-mail: jmthomas@tricity.wsu.edu

Acrolein:
Overhead Irrigation Use - Oregon Apples and Grapes

Last Name:	First Name:	Organization:	Title:	Work Ph:	Email:	Responsible State:
Bridgewater	Bev	West Extension Irrigation District	Manager	(541) 922-3814	bbridge@oregontrail.net	Oregon
Chamberlin	Jay	Owhyee Irrigation District	Manager	(541) 372-3540		Oregon
Culbertson	Monty	Owyhee Ditch Company	Manager	(541) 889-4787		Oregon
Kopacz	Ray	Stanfield Irrigation District	Manager	(541) 449-3272		Oregon
McMillan	Steve	Oregon Department of Environmental Quality	Permit Writer	(541) 278-4617		Oregon
Nomura	Ranei	Oregon Department of Environmental Quality	Policy Analyst	(541) 686-7799	NOMURA.Ranei@deq.state.or.us	Oregon
Rhoden	Russ	Ochoco Irrigation District	Manager	(541) 447-6449	ochocoid@crestviewcable.com	Oregon
Ringing	Robert	North Unit Irrigation District	Assistant Manager	(541) 475-3625		Oregon
Stuntebeck	Mark	Klamath Irrigation District	Manager	(541) 882-6661		Oregon
Ward	Scott	Vale Oregon Irrigation District	Manager	(541) 473-3243		Oregon
Wick	Mike	Westland Irrigation District	Manager	(541) 667-2030	wid.m.wick@eotnet.net	Oregon
Wilcox	Chuck	Hermiston Irrigation District	Manager	(541) 567-3024	hid@eoni.com	Oregon
Winkler	Anita	Oregon Water Resources Congress	Executive Director	(503) 363-0121	anitaw@owrc.org	Oregon
Lanier	Will	Montana State University	Western IPM Center State Liaisons/Representatives	(406) 994-5690	wlanier@montana.edu	Montana
Daniels	Catherine	Washington State University		(509) 372-7495	cdaniels@tricity.wsu.edu	Washington
Deer	Howard	Utah State University		(435) 797-1602	howardd@ext.usu.edu	Utah
Hirnyck	Ronda	University of Idaho		(208) 364-4046	rhirnyck@uidaho.edu	Idaho
Jahns	Tom	University of Alaska Fairbanks		(907) 262-5824	fftrj@uaf.edu	Alaska
Jenkins	Jeff	Oregon State University		(541) 737-5993	jenkinsj@ace.orst.edu	Oregon