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Subject: **Docket ID Number EPA-HQ-OPP-2013-0266**

Atrazine0062

Comments in Response to *Atrazine Registration Review: Draft Human Health Risk Assessment for Atrazine*

The following comments are being submitted in response to the July 26, 2018 Federal Register notice announcing the availability and seeking public comments for EPA's draft human health risk assessment for Atrazine. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on available use data of Atrazine for macadamia and corn seeds in Hawaii.

Corn seeds

Atrazine is applied in corn to control target weeds such as Foxtail grass, Velvetleaf and pigweed. It is applied according to label recommendations up to maximum of 4 pints/Acre (2 lbs ai/Acre). Ground application of Atrazine using boom sprayer is done during the early vegetative stage of the crop depending on weed pressure and following label recommendations. Weed management best practice include rotational use of multiple mode of action (MOA) herbicides. Corn growers in Hawaii use an integrated weed management approach that includes chemical, cultural, and mechanical controls to minimize the development of resistance. The economic impact to growers if Atrazine will not be available would mean losing a highly effective mode of action herbicide, possibly resulting in more in-crop chemical applications to combat weed pressure. Growers had expressed concern that alternatives to Atrazine are limited in corn, and reliance to very narrow arsenal of herbicides could lead to an increasing risk of weed resistance development to other chemistries like ALS inhibitors.

Macadamia

In Hawaii, the herbicide Atrazine is generally used by macadamia growers to control various annual weeds although it is observed to be less effective for perennial weeds present in the farm. Atrazine works best for the control of "kinchi" or Spanish needle. The typical application rate is 2.5 lbs per Acre of product (90% a.i.). It is applied once a year on not more than 3% of total acres planted with macadamia trees. Atrazine is applied on the ground using a boom sprayer as a post-emergence herbicide. Applications are made when nuts are not on the ground. The alternative herbicide for Atrazine is Diuron which had been proven to be more effective for residual weed control. Growers had some concerns about possible development of weed resistance due to continued use of Atrazine, but so far, resistance has not been observed. Minimal economic impact to macadamia growers if Atrazine will not be available as a weed control option. A representative of the Hawaii Macadamia Nut Association, however, do not want to lose the product Atrazine that they claim has not cause harm to the macadamia industry in Hawaii.

Comments were received from the representatives of the Hawaii Macadamia Nut Association (HMNA) and corn seed growers in Hawaii.

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