Azinphos-Methyl Information Request -- California Response

From: Rick Melnicoe
Sent: October 25, 2011 12:42 PM
To: Tom Myers
Subject: RE: RESPONSE TO EPA BY October 26: EPA AZM Questions on apples, pears, sweet & tart cherries, blueberries, parsley, and alkali bee beds

Dear Tom,

Attached (Excel 15K) are Pesticide Use Data from California for the use of Azinphos-methyl in 2010. As you can see, use has been limited to Apples, Cherries and Pears. Also, as the phase-out winds down, growers are using Azinphos-methyl less each year. While there now is limited use in California, it remains a valuable tool for those growers needed alternative chemistries for pest control.

If EPA is seriously considering conducting a new risk-benefit for these uses, I am certain it would be welcomed by California growers. We hope that you would use the real-world use data that we have in California.

I was not able to conduct any survey of growers due to my participation in an international IPM meeting in Berlin last week. Normally we have 3 weeks in which to respond.

Sincerely,

Rick

The production agricultural use of Azinphos-Methyl on all crops in California in 2010. The measures of use are described in the accompanying table.

Crop or Site	AI	Num. of Fields	% Base Acres Treated	Base Acres Treated	Cum. Acres Treated	Total Lbs AI	Lbs AI/ acre treated				Num. Applications per treated field						
							Med rate	Min rate	Max rate	Num. apps	Med apps/ field	Min apps/ field	Max apps/ field	Num. WFE apps	Med WFE/ field	Min WFE/ field	Max WFE/ field
APPLE	AZINPHOS-METHYL	44	7.72	733	1,004	1,055	1.00	0.33	1.50	72	2.00	1.00	3.00	65.97	1.55	0.33	2.54
CHERRY	AZINPHOS-METHYL	12	1.05	364	364	264	0.75	0.75	0.75	12	1.00	1.00	1.00	12.00	1.00	1.00	1.00
PEAR	AZINPHOS-METHYL	17	1.56	192	356	299	1.00	0.03	1.50	32	2.00	1.00	3.00	30.54	2.00	1.00	2.50

Worksheet "ag uses" gives pesticide use statistics for all reported production agriculture uses.
"Nonag uses" gives use by site and AI for other uses. "Nonag" applications on crops are mostly post harvest applications.
"All uses" gives both agricultural and other uses.

Description of all columns used in the "ag uses" pesticide use table

"Num. of Fields" is the number of fields that were treated with an AI.
"% Base Acres Treated" is the percent of acres of crop planted, as calculated from the PUR, that were treated one or more times by each active ingredient (AI).
"Base Acres Treated" is the total number of acres planted that were treated one or more times by each AI.
"Cumulative Acres Treated" is the sum of the acres treated for each application even when the same area was treated more than once.
"Total Lbs AI" is the sum of pounds of each AI used on this crop.
"Med rate" is the median rate of all applications.
"Min rate" is the smallest rate after removing the lowest 2.5% of the rate values.
"Max rate" is the largest rate after removing the highest 2.5% of the rate values.
"Num. apps." is the number of applications of the AI in the crop. Applications of the same AI to the same field within 2 days is counted as one application.
"Med apps/field" is the median number of applications per field, taken over only fields treated with the AI.
"Min apps/field" is the smallest number of applications per treated field after removing the lowest 2.5% of values.
"Max apps/field" is the largest number of applications per treated field after removing the highest 2.5% of values
"Num. WFE apps" is the number of "whole field equivalent (WFE)" applications. A WFE application is the acres treated divided by acres planted in that field.
"Med WFE/ field" is the median number of WFE applications per field, taken over all treated fields
Min WFE/ field" is the smallest number of WFE applications per treated field after removing the lowest 1.0% of values
"Max WFE/ field" is the largest number of WFE applications per treated field after removing the highest 1.0% of values

Data is from Department of Pesticide Regulation's Pesticide Use Report with probable errors in pounds removed.