## **Azinphos-Methyl Information Request -- California Response**

From: <u>Rick Melnicoe</u> Sent: October 25, 2011 12:42 PM To: <u>Tom Myers</u> 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,

<u>Attached</u> (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 accompaning table.

Num. of Crop or SiteNum. of FieldsAcres TreatedBase Acres TreatedAcres TreatedTotal Lbs AlMed rateMax Min rateNum. rateapps/ apps/ apps/ fieldapps/ fieldapps/ fieldapps/ fieldapps/ fieldMum. MFE/ MFE/ MFE/ fieldWFE/ field <th>r</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>ļ</th> <th colspan="2">Lbs Al/ acre treated</th> <th>ated</th> <th></th> <th></th> <th>Nur</th> <th>n. Applie</th> <th colspan="3">cations per treated field</th> <th></th>	r						ļ	Lbs Al/ acre treated		ated			Nur	n. Applie	cations per treated field			
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Crop or Site         Al         Fields         Treated         Treated         Treated         Treated         Treated         Lbs Al         rate         Min rate         rate         Pair A           PPLE         AZINPHOS-METHYL         144         7.72         7.73         1,004         1.055         1.00         0.33         1.50         7.2         2.00         1.00         3.00         65.97         1.55         0.33         1.50         7.2         2.00         1.00			Num. of	Acres	Base Acres	Acres	Total	Med		Max	Num.	apps/	apps/	apps/	Num.	WFE/	WFE/	WFE
HERRY       AZINPHOS-METHYL       12       1.05       364       364       264       0.75       0.75       12       1.00       1.00       12.00       1.00	rop or Site	AI	Fields	Treated	Treated	Treated	Lbs Al	rate	Min rate	rate	apps	field	field		WFE apps	field	field	field
EAR       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       7         Vorksheet "ag uses" gives pesticide use statistics for all reported production agriculture uses.       Nonag' applications on crops are mostly post harvest applications.       Num set of fields that were treated with an Al.       Nonag' applications on crops are mostly post harvest applications.       Num. of Fields" is the number of fields that were treated with an Al.       Nomage access Treated" is the percent of acress of crop planted, as calculated from the PUR, that were treated one or more times by each active ingredient (Al).       Sease Acress Treated" is the total number of acres of crop planted, as calculated from the PUR, that were treated more than once.       Total Lbs Al" is the sum of pounds of each Al used on this crop.         Wod rate" is the total number of applications.       Mum atps." is the number of applications.       Num. apps." is the number of applications.       Num. apps." is the number of applications of the rate values.         Num apps." is the analest number of applications per treated field after removing the lowest 2.5% of the rate values.       Num. applications of the acres treated field after removing the lowest 2.5% of values.       Num. applications of the applications of the same Al to the same field within 2 days is counted as one application.       Num. applications of the applications of the atter treated with the Al.       Num. appliciteld" is the smallest number of applications per trea	PPLE	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	2.5
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