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MĀNOA

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Labeling Committee
Office of Pesticide Programs
Environmental Protection Agency
OPP_labelling_consistency@epa.gov

Subject: Chemigation
Comments in Response to **Chemigation Opportunity for Public Comment**

The following comments are being submitted in response to the December 5, 2008 EPA web site announcement *EPA Requests Comment on their new Chemigation Labeling Paper proposing to revise PR Notice 87-1 and Comment Period Extended on EPA Chemigation Labeling Paper*, email from EPA Pesticide Program Updates from EPA's Office of Pesticide Programs 01/30/09. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide feedback the new label guidance for the labeling of **algaecide** products applied to irrigation systems in Hawai'i.

In Hawai'i, algaecides and antimicrobials are used to disinfect the irrigation water for the purpose of maintaining the irrigation system. Users propose that routine use of products such as chlorine for this purpose be exempt from the chemigation posting requirement. This application is not the usual chemigation application, in which a pesticide is applied via the irrigation system to treat a specific site such as a crop or the soil after the water is released from the irrigation system. Instead, the irrigation water is the carrier of the pesticide to components *within* the irrigation water.

There are situations when a high concentration of the pesticide product is used such as in a super-chlorination application. The actual site of treatment would still be the components of irrigation system itself--the transmission lines, filters, valves, etc. that are fouled with organisms such as algae or bacterial slimes. These types of super-chlorination treatments would be done only on occasion and would not be part of routine maintenance. However, when applied according to the label directions, it is apparent that the chlorine is rapidly consumed and dissipated as it traverses the irrigation system; for example, chlorine applied at 100ppm exits the irrigation system at 10-20ppm- a level which is considered safe for short term exposure in drinking water. Therefore, posting should not be required even in for super-chlorination applications.

Information and comments have been provided by representatives of Hawai'i's sugarcane and coffee industries and a local chemical vendor.

Comments compiled and submitted by:

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