



September 24, 2004

Carmen Rodia
7508C USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Below is the information that you requested in your September 17, 2004 e-mail regarding the impregnation of cycloate onto dry fertilizer and about the impact of a proposed 48-hour Re-Entry Interval (REI).

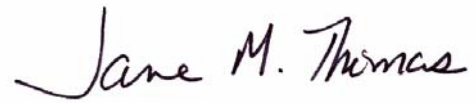
Cycloate Impregnated Fertilizer – Mixing cycloate with fertilizer is never done on-farm. It is done by the certified commercial applicator when he/she prepares the fertilizer for the specific application.

Proposed 48-hour REI – The imposition of a 48-hour REI will render cycloate essentially unusable in table beet, table beet seed, spinach, and spinach seed crops in the Pacific Northwest. As stated in our initial cycloate response to you on May 7, the continued use of cycloate is critical for the successful production of these crops. The four crops mentioned above are all grown in western Oregon and western Washington where spring weather is typically rainy. The usual sequence for crops treated with cycloate is to prepare the field, apply and incorporate cycloate, and then plant. In Oregon table beet and spinach growing areas, growers also require field access after planting is complete to set up irrigation piping. In these wet areas, growers wait to start field preparation until weather permits. Growers require a rain-free period long enough to allow them to complete field preparation, cycloate application and incorporation, and planting. If significant rainfall occurs before the crop has been planted then growers must scrap their efforts and begin again. Rain causes two problems. Fields get so muddy that growers can't get equipment in for operations such as planting. Also rainfall will cause the top layer of soil to form a crust. Because seeds need good soil contact for germination, growers can't plant in fields where crust has developed. If growers are required to wait 48 hours between cycloate application and planting, it is likely that rainfall will occur and growers would be required to start again with field preparation.

The situation is somewhat different with sugarbeets. Here growers must also prepare fields, apply and incorporate cycloate, and plant. However, if required by the REI, an industry representative indicated that sugarbeet growers would be able to tolerate a 48 hour delay between cycloate application and planting.

I hope that you find this information useful.

Sincerely,

A handwritten signature in black ink that reads "Jane M. Thomas". The signature is written in a cursive style with a large, sweeping initial "J".

Jane M. Thomas
Pacific Northwest Coalition Comment Coordinator
Washington State Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99352
phone: 509-372-7493 fax: 509-372-7491
e-mail: jmthomas@tricity.wsu.edu