Comments in Response to 1,3-Dichloropropene Risk Assessment; Notice of Availability: Pineapple in Hawaii

Date: September 9, 2005

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Subject: Docket ID Number OPP-2005-0124

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Information provided by the Pineapple Growers' Association of Hawaii

- Microsoft Word document

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1- Crop	Pineapple
2- Fumigant Use	Telone II (1,3 dichloropropene)
3- Average acres grown per enterprise	3500 acres
4- Maximum acres fumigated per day	5.0 acres per day
5- Percent of acres grown that are fumigated	100 percent
6- Typical application rate (lb a.i /acre)	230 lb a.i per acre
7- Minimum application rate used (lb a.i/acre) for high pest pressure situations)	230 lb a.i per acre
8- Time of the year that soil is fumigated	All year round
9- Fumigation cycle (every crop cycle, 1 time/year, 1 time/2 years)	1 time every three years
10- Target pest (by category or specific pest)	Reniform nematode
11- Method of application (e.g.. Chemigation, soil injection, specific equipment used etc)	Soil injection
12- Methods of action taken to reduce emissions (polyethylene tarps or soil cap)	Usage of plastic mulch (polyethylene tarp)
13- Could high-density polyethylene (HDPE) or high barriers tarps be used on this crop	Yes
14- Time between treatment and next production activity (e.g.. Time until planting)	About 7 to 10 days
15- Typical crops following the fumigated crop (only if they benefit from the fumigation)	None
16- Regulatory restrictions in your area on this fumigant or an alternative fumigant (such as weather restrictions)	
17- Soil restrictions on this fumigant or an alternative fumigant	
18- Any restriction or concerns about minimum soil temperature, hilly terrain, etc)	No in Hawaii (where pineapple is cultivated) soil temperature is very uniform year round. No less than 40ºF.
19- Best available alternative (another fumigant or strategy such as leaving land fallow etc)	Best cultural practice is long periods of fallow and addition of organic matter to the soil
20- Could the use of different soil fumigants be alternative (e.g., metam sodium followed by 1,3 D). Specify how	
21- Yield and quality impacts that are likely to result from moving to the best available alternative. (i.e., change in commodity price or grade)	
22- Would moving to the next best alternative impact key market windows? How?	
23- Cost per acre of active ingredient	$211 per acre
24- Cost per acre of other fumigation inputs (e.g.. Tarps and equipment)	$450 per acre
25- Is there a crop budget available for your area and crop?	No
26- Do you know of any other contacts or other sources of information for this crop that could provide information on acreage, prices, pest, etc?	No
27- Are there non-chemical alternatives that can be used in place of fumigants? Describe use.	None

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