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MĀNOA

October 10, 2013

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2013-0496**

Comments in Response to:

- 1) *Notice of Receipt of Pesticide Products; Registration Applications To Register New Uses: 1,3-Dichloropropene*; and
- 2) *Pesticide Petitions: Residues of Pesticide Chemicals in or on Various Commodities* (Interregional Research Project Number 4 [IR-4] request to establish a tolerance for the combined residues of the fungicide, *cis*- and *trans*-1,3-dichloropropene, including its metabolites and degradates, in or on pineapple).

The enclosed comments are being submitted in response to two (2) *Federal Register* notices: 1) the September 11, 2013 *Federal Register* notice regarding receipt of applications to register new uses for pesticide products containing currently registered active ingredients; and 2) the September 12, 2013 *Federal Register* notice regarding receipt of initial filings of pesticide petitions requesting the establishment of the regulation for residues of pesticide chemicals on various commodities. The comments are those of the Pineapple Growers' Association of Hawai'i (PGAH) and being submitted on behalf of PGAH and the Western Integrated Pest Management Center.

The enclosed comments are duplicates of comments submitted to Regulations.gov on October 10, 2013, during the federal government shutdown (receipts enclosed). Contact Cathy if electronic versions of the comments are required.

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October 10, 2013

To: Environmental Protection Agency
Registration Division
Office of Pesticide Programs

From: Pineapple Growers Association
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Subject: Hawaiian Pineapple Industry's Letter of Support for Establishment of Tolerances for Residues of 1,3 Dichloropropene in or on Pineapple

(EPA-HQ-OPP-2013-0496;FRL-9399-7; Docket No. 2113-22218)

Summary. The Pineapple Growers Association of Hawaii supports the establishment of tolerances for 1,3 dichloropropene and its metabolites and degradates under 40 CFR 180 of 0.02 ppm in or on pineapple.

The purpose of this memorandum is to provide EPA with comments supporting the establishment of a tolerances for 1,3 dichloropropene and its metabolites and degradates of 0.02 parts per million in or on pineapple. The tolerances are intended to support registration of Cordon (EPA Reg. No. 62719-363 and EPA Reg. No. 62719-341) applied as post-plant drip applications for suppression of nematodes in pineapple.

The management of parasitic nematodes is one of the most important limiting factors affecting economic pineapple production in Hawaii. In order to sustain the Hawaiian pineapple industry, it is critical to register Cordon (EPA Reg. No. 62719-363) as a replacement for post-plant uses of the organophosphorous pesticide, fenamiphos. The rationale and justification for approval of the registration of Cordon was presented in the Pineapple Growers Association of Hawaii's comments on Docket No. EPA-HQ-OPP-2113-0496 dated October 10, 2013.

Telone II, Telone C-17, and InLine are currently registered for pre-plant applications of 1,3 D. The pre-plant uses are applied more than one year before harvest and are regulated as non-food uses that are exempt from tolerances.

The IR-4 Program submitted a tolerance petition (FR 78, No. 177, Page 56187, Number 4) to establish tolerances for the soil fumigant, cis- and trans-1,3-dichloropropene, including its metabolites and degradates, in or on pineapple at 0.02 ppm. The proposed tolerances are intended to support the registration of supplemental labeling for Cordon applied as post-plant drip applications similar to registered uses in grapes.

The analytical study report for the Cordon field crop residues studies in pineapple demonstrated that there are no detectable residues of 1,3 D after three post-plant drip applications of 150 and 750 ppm applied up to 120 days prior to anticipated harvests. The proposed tolerance of 0.02 ppm in or on pineapple provides an adequate enforcement standard to monitor acceptable concentrations of 1,3 D in or on pineapple and pineapple juice.

The Pineapple Growers Association of Hawaii strongly supports the establishment of tolerances for 1,3 D in or on pineapple to allow registration of Cordon for post-plant uses.

On behalf of the people of the Hawaiian Pineapple Industry, please allow me to thank EPA, IR-4, the Hawaii Department of Agriculture, and Dow AgroSciences for their strong support in providing safe and effective resources to sustain our historically significant industry. If there are any questions or comments, please contact Calvin Oda at the telephone number or e-mail address listed above.

October 10, 2013

To: Environmental Protection Agency
Registration Division
Office of Pesticide Programs

From: Pineapple Growers Association of Hawaii
Calvin Oda
Authorized Organization Representative
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Subject: Hawaiian Pineapple Industry's Letter of Support for Registration of Cordon (1,3 dichloropropene) Applied Through Drip Irrigation Systems for Post-plant Nematode Control

(EPA Registration No(s): 62719-363 and 62719-341. Docket ID No. EPA-HQ-OPP-2113-0496)

Summary.. The Pineapple Growers Association of Hawaii, a Pesticide Environmental Stewardship Program member, respectfully requests that EPA approve the supplemental labeling for Cordon (EPA Reg. No. 62719-363) applied as post-plant drip applications for suppression of nematodes in pineapple grown in Hawaii.

The purpose of this memorandum is to provide EPA with comments supporting the approval of the registration for Cordon (1,3 dichloropropene) applied as post-plant drip applications for parasitic nematode control in pineapple.

The economic control of parasitic nematodes is one of the most important limiting factors affecting pineapple production in Hawaii. Of the five parasitic nematode species found in pineapple culture in Hawaii, the reniform (*Rotylenchulus reniformis*) and root knot (*Meloidygne javanica*) are of major economic importance. Root damage from nematode feeding results in slower and stunted plant growth, lower crop yields and reduction in recovery of fresh pineapple boxes per acre, lower predictability of fruit deliveries, higher percentage of fruit quality defects such as lodging and crooked crowns, and ultimately crop failure if nematodes are not effectively managed.

Pineapple crop management systems relies on producing two to three crops from a single planting. The two to three crop cycle may require three to five years to complete increasing the impact of losses associated with nematodes.. Pineapple root systems grow adventitiously from the lower leaf axils of the vegetative planting material. The primary and secondary pineapple roots that are critical for water and nutrient uptake and plant anchorage do not re-generate after they are damaged or lost due to nematode feeding. Functional root systems are required to produce multiple crops or ratoons from a single planting, therefore, the roots must be protected throughout most of the long crop cycles. In addition, the new Gold pineapple varieties that are grown for

the fresh market have less extensive and weaker root systems than traditional Smooth Cayenne clones that were previously grown in Hawaii. Therefore, it is even more important to manage nematodes effectively to produce economic crop yields of the Gold pineapples that are sold in a very competitive marketplace.

Telone II (EPA Reg. No. 62719-32) and Telone C-17 (EPA Reg. No. 62719-12) are registered for pre-plant soil chisel injection applications for control of parasitic nematodes and other soil borne pests in pineapple. InLine (EPA Reg. No. 62719-348) is registered for pre-plant drip applications to control parasitic nematodes and other soil borne pests in pineapple. Telone II, Telone C-17, and InLine applied at label rates and approved application methods are very effective for initial and short term residual control of nematodes. Depending on the site conditions, nematode population densities start to 're-bounce' after 6 months after planting. Therefore, it is important to manage nematode population densities using post-plant nematicides to ensure attainment of economic ratoon (second and third) crop yields.

For many years, nematode population densities were effectively managed by alternating post-plant drip applications of Vydate L (oxamyl) and Nemacur 3 (fenamiphos). Post-plant nematicides are applied at low application rates to disorient females from entering the secondary roots and reduce reproductive capacities to manage nematode population levels. Fenamiphos is more effective than oxamyl for nematode control. However, both pesticide active ingredients were applied to reduce the occurrence of nematode resistance and accelerated microbial degradation in tropical soils.

Pre-plant soil chisel injection applications of Telone II at 24 to 30 gallons per acre followed by post-plant drip applications of fenamiphos and oxamyl at 0.5 to 1.0 lb. active ingredient per acre at bi-monthly treatment intervals results in an average of 15 percent higher crop yields and 34 percent more fresh fruit in larger saleable fruit sizes than Telone II only.

Today, Vydate L (oxamyl) is the only registered nematicide registered for post-plant control of nematodes. With the exception of early research studies, oxamyl has never been applied without fenamiphos in post-plant drip applications. Nematode management programs have always highlighted fenamiphos applications due to its greater efficacy. Oxamyl applied alone without a pest resistance and microbial degradation management strategy may rendered it useless to Hawaiian growers in the future. Nemacur 3 (fenamiphos) was voluntarily cancelled in late 2002 with a five year phase out of manufacturing for pineapple and other crops grown in areas with depth to groundwater of 200 feet or more. All uses of fenamiphos in pineapple grown in Hawaii will cease by October 5, 2014.

In recognition of the importance of post-plant nematode control to attain economic yields, the IR-4 Program, DowAgroSciences LLC, and the Pineapple Growers Association of Hawaii conducted field crop residues studies to support registration of Cordon (EPA Reg. No. 62719-363) in pineapple. The studies to develop the

organophosphorous (fenamiphos) replacement were conducted during the period when EPA allowed continued use of fenamiphos under the existing stocks provision of FIFRA to allow registration of alternatives. The registration of Cordon for post-plant nematode control in pineapple represents one of the success stories in the monumental task of the registration of OP replacement.

The proposed supplemental labeling for Cordon allowing three post-plant drip applications of 250 to 500 ppm 1,3 D per acre is effective for and provides for great flexibility in refining nematode management programs. The results of previous efficacy studies indicated that three applications of 1,3D at 100 to 150 parts per million is as effective as the post-plant fenamiphos and oxamyl treatments in attaining target crop yields and saleable product recovery. With 1,3 D, the objective is to directly 'knockdown' nematode population densities before they reach economic threshold levels rather than inhibit feeding and reproduction.

The Cordon registration does not pose significant risks to human health and the environment. Cordon can and will be applied safely in pineapple. 1,3 D is significantly less acutely toxic than fenamiphos. Handlers and applicators are well protected with personal protective equipment. The drip applications are made from cylinders using enclosed application systems. The applications are made in water under agricultural mulches specifically designed to be methyl bromide barriers. The label restrictions establish buffer zones and restricted entry intervals that minimize occupational and residential exposure. The pre-harvest interval of 120 days results in an absence of detectable residues in pineapple. Therefore, there are no dietary risks of concern. In addition, 1,3 D has never been detected in groundwater in Hawaii.

The Pineapple Growers Association of Hawaii respectfully requests that EPA approve the supplemental labeling for Cordon for suppression of nematodes in pineapple. It provides an effective and a lower acute toxicity replacement to fenamiphos in pineapple.

On behalf of the people of the Hawaiian Pineapple Industry, please allow me to thank EPA (and especially Ms. Lois Rossi) for the continuous support in trying to preserve critical agricultural jobs in Hawaii through effective pesticide regulation and good science. In this case, pineapple growers were allowed more than adequate time to develop the replacement for fenamiphos.

If there are any questions, please contact Calvin Oda at the contact information listed above.