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March 7, 2006

Dr. Teung F. Chin
Office of Pest Management Policy
USDA Animal & Plant Health Inspection Service
4700 River Road, Unit 149 (Room 5A66)
Riverdale, MD 20737-1237

RE: Additional Dimethoate Replies for Several Crops in California

Dear Teung,

This letter is in response to your March 3, 2006, request for additional information concerning the use of dimethoate on 11 crops. In your request you stated, "additional feedback is needed if you wish to retain two applications for the following crops: Cotton, field/pop corn, and wheat, citrus, pears, alfalfa, safflower, pecans, peppers, and grass seed. Efforts are already underway to retain two applications for cherries and succulent peas. If you need two applications, is one an early application and the second a late season application? (Drinking water assessments are significantly improved if any two applications are far apart in time). Aerial applications result in greater drinking water risk than ground applications. EPA is now assuming:

Cotton - two applications, 14 days apart

Field/pop corn - two applications, 7 days apart

Wheat - two applications, 5 days apart

Citrus - two applications 31 days apart (Is dimethoate applied aerially for citrus?)

Alfalfa (seed and hay) - only one application

Safflower - two applications, 14 days apart

Pecans - only one application (Is dimethoate applied aerially for pecans?)

Peppers - only one application (Is dimethoate applied aerially for peppers?)

Grass Seed - 0.5 lb a.i./Acre (Is dimethoate applied aerially for grass for seed?)

Also, if the applications are not rainy season, then run-off is significantly reduced as well.

EPA wishes to complete its final decisions on dimethoate so your feedback the week of March 6 would be optimal."

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Cotton:

Two applications, 14 days apart should not be an undue burden.

Field/popcorn:

Two applications, 7 days apart should not be a burden. Two applications were the maximum number made in 2004. Very few multiple applications were at less than 7 day intervals.

Wheat:

Two applications, 5 days apart should not be a burden. The current label allows 2 applications, with no time limit between applications. However, the maximum number of applications per season made in 2004 was one.

Citrus:

Two applications 31 days apart should not be a burden as only one application per year is typically made. Dimethoate is rarely applied aurally to citrus. Only 4 aerial applications were made in 2004.

Alfalfa (seed and hay):

Typically only one application is made per growing season.

Safflower:

Two applications, 14 days apart should not be a burden as typically one application is made per season.

Pecans:

Typically one application is made per season. Only two aerial applications of dimethoate were made to a total of 31 acres in 2003-4.

Peppers:

Typically there is only one application per season. Dimethoate may be applied by air. This method is needed for large fields.

Grass Seed:

There is very little grass seed in California and no dimethoate was reported used in 2004.

Pears:

There was no question; however, there were only 7 applications of dimethoate made in 2004.

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All data were obtained from the California Department of Pesticide Regulation's Pesticide Use Report database.

If you have any further questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Rick Melnicoe". The signature is written in a cursive, flowing style.

Rick Melnicoe
Director, Western IPM Center