

Endosulfan Information Request

From: Allen Jennings

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Cc: Burr, Wilfred; Chin, Teung F -APHIS; Scott Rawlins; willet@nwhort.org

Subject: Endosulfan Update

Colleagues,

The purpose of this note is to update you on recent and planned actions affecting ENDOSULFAN and ask that you pass this information along to crop production specialists and growers in your region.

The RED for endosulfan was issued in 2002 and identified the risk reduction measures listed below. EPA has now mandated new product labels to reflect these risk reduction measures. The label changes will impact the use of the chemical next growing season.

At the same time, EPA has evaluated new toxicological data submitted by the registrant and plans to issue an updated risk assessment for public comment soon. Because of the new data, the risk has shifted to less concern about dietary exposure and greater concern about worker exposure.

Although it is not yet clear how EPA would consider new information on the impact of the label changes, please review the following risk mitigation measures and advise me of any potential significant impacts.

Thank you.

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Endosulfan Risk Mitigation Measures

To mitigate human health and ecological risks of concern for endosulfan, the following measures will be implemented:

Dietary (Food) Risk

--Delete use on succulent beans, succulent peas, spinach, and grapes

Dietary (Drinking Water) and Ecological Risk

Several mitigation measures are needed to reduce the potential for contamination of drinking water.

--Delete use on pecans;

--Reduce maximum seasonal application rates from 3lbs./ai/A to 2.5 lbs./ai/A for pome fruit, stone fruit, and citrus;

--Reduce maximum seasonal application rate from 3 lbs./ai/A to 2 lbs./ai/A for melons, cucurbits, lettuce, tomatoes, sweet potatoes, cotton (ground), broccoli, cauliflower, cabbage, kohlrabi, brussels sprouts, strawberries, filberts, walnuts, almonds, macadamia nuts, peppers, eggplant,

potatoes, carrots, dry beans, dry peas, and tobacco;

--Reduce maximum seasonal application rate from 3 lbs./ai/A to 1.5 lbs./ai/A for sweet corn, cotton (aerial) and blueberries;

--Reduce maximum seasonal application rate from 3 lbs./ai/A to 1 lb./ai/A for celery;

--Require 100 ft. spray buffer for ground applications between a treated area and water bodies;

--Require 30 ft. maintained vegetative buffer strip between a treated area and water bodies;

--Require all products to be Restricted Use;

--Restrict use on cotton to AZ, CA, NM, OK and TX only; and

--Restrict use on tobacco to IN, KY, OH, PA, TN and WV only.

Occupational Risk

--Require all wettable powders to be packaged in water soluble bags;

--Cancel use of wettable powders on tomatoes, sweet corn, sweet potatoes, cotton, small grains, alfalfa (seed), carrots, dry beans, dry peas, pineapples, and tobacco;

--Cancel aerial application using the wettable powder formulation on pome fruits, stone fruits, citrus, blueberries, strawberries, collard greens (seed), kale (seed), mustard greens (seed), radish (seed), turnip (seed), rutabaga (seed), broccoli, (seed), cauliflower (seed), kohlrabi (seed), cabbage (seed), filberts, walnuts, almonds, and macadamia nuts;

--Require closed mixing/loading systems for aerial application using the EC formulation on pome fruits, stone fruits, citrus, sweet corn, sweet potatoes, cotton, collard greens (seed), kale (seed), mustard greens (seed), radish (seed), turnip (seed), rutabaga (seed), broccoli, (seed), cauliflower (seed), kohlrabi (seed), cabbage (seed), blueberries, small grains, alfalfa (seed), filberts, walnuts, almonds and macadamia nuts;

--Require closed cabs for airblast applications on pome fruits, stone fruits, citrus, filberts, walnuts, almonds and macadamia nuts;

--Prohibit use of high pressure handwands with rates greater than 0.005 lbs/ai/gal;

--Increase REI to 48 hours for all crops except as noted in the following bullets;

--Increase REI for WP products to 3 days for melons and cucurbits;

--Increase REI for WP products to 4 days for lettuce, celery, pome fruit, stone fruit, citrus, collard greens, kale, mustard greens, radish, turnip, rutabaga, ornamental trees and shrubs;

--Increase REI for WP products to 5 days for collard greens (seed), kale (seed), mustard greens (seed), radish (seed), turnip (seed) and rutabaga (seed);

--Increase REI for WP products to 9 days for blueberries, broccoli, cauliflower, kohlrabi, cabbage, and brussels sprouts;

--Increase REI for WP products to 12 days for broccoli (seed), cauliflower (seed), kohlrabi (seed), and cabbage (seed);

--Increase REI for EC products to 3 days for sweet potatoes

--Increase REI for EC products to 4 days for broccoli, cauliflower, kohlrabi, cabbage, and brussels sprouts;

--Increase REI for EC products to 6 days for blueberries;

--Increase REI for EC products to 7 days for broccoli (seed), kohlrabi (seed), and cabbage (seed); and

--Increase REI for EC products to 17 days for sweet corn.

The Western IPM Center is headquartered in the UC Agriculture and Natural Resources Building at 2801 Second Street, Davis, CA 95618.