



Integrated Plant Protection Center
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Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001

Re: EPA-HQ-OPP-2010-0478-0045, Registration Review Proposed Decisions for Sulfonylureas

The following comments are being submitted regarding the registration review proposed decisions for sulfonylureas. These comments are being submitted on behalf of the Western IPM Center and provide input from Pacific Northwest commodities.

Several of the active ingredients within this list of 22 sulfonylureas are used for weed control in many crops of economic importance in the Pacific Northwest, including grass seed, potato, wheat, and sugarbeet. Concerns among these industries regarding EPA's proposed decision relate mainly to the issue of droplet size.

The "Extremely Coarse" droplet size proposed by EPA for these products, which would be classified by ASABE S572 as drops >450 microns in size, are typically only recommended for soil applied herbicides (pre-emergent), which are then incorporated into the soil. It is a concern that post-emergence weed control with contact only products will be less efficacious with the new drop size requirement due to a lack of spray coverage on target foliage. Drops of this size also shatter in contact with leaf surfaces, and the resultant droplets may sediment to soil, resulting in a loss of efficacy, and the potential for environmental mobility. There is uncertainty regarding whether or not herbicides that easily translocate within the plant offer reduced weed control if exposed to Extremely Coarse drops. It is suggested that before such restrictions are implemented, more research is needed on the efficacy of these ingredients on weed control with the proposed drop size, and on new nozzle design technology that could preclude the need for these restrictions yet still achieve drift mitigation.

Information was also gathered from Oregon's Department of Transportation (ODOT), which uses three main sulfonylureas: chlorsulfuron (for noxious weed control and bare ground shoulder applications; ~ 920 acres treated in 2015), metsulfuron-methyl (for noxious weed control and brush; ~2400 acres treated in 2015), and sulfometuron-methyl (for noxious weeds, bare ground shoulder applications; ~853 acres treated in 2015).



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Primary concerns from ODOT regarding EPA's proposed decisions relate to the proposed boom height of less than two feet. Many road shoulder applications are made with an adjustable spray boom that has banks of nozzles that are mounted 50 to 60 inches high. Nozzles are turned on and off to achieve the desirable width. Although the resulting spray pattern is already made up of Extremely Coarse droplets, the proposed boom height would either force roadside managers to refrain from using the sulfonyleureas, or switch to a different spray technology that may result in increased drift potential.

Respectfully,

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Katie Murray is a research assistant in the Integrated Plant Protection Center (IPPC) and is the Western IPM Center's EPA Comment Coordinator for the Pacific Northwest. Katie has expertise in agricultural stakeholder engagement and assessment methods related to understanding pesticide usage, as well as the use of, and pesticide compatibility with, IPM.

The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.

To compile EPA comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments are an independent assessment and do not imply endorsement by Oregon State University or the Western IPM Center.