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Office of Pesticide Programs
Special Review and Reregistration Division (7508P)
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Subject: Comments to Docket EPA-HQ-OPP-2004-0348 on the Malathion RED

Since the summer of 2004 the Western IPM Center’s Pacific Northwest (PNW) Workgroup has submitted five responses (attached) to a variety of malathion information requests from USDA. These requests were generated through USDA’s involvement in the malathion reregistration process. While most of the issues raised in previous submittals have been satisfactorily addressed by EPA, the malathion Reregistration Eligibility Decision (RED) document contains several provisions, discussed below, that are problematic to PNW growers.

**BLUEBERRY**
As we have previously indicated, blueberry growers in our region require a 2# ai/A use rate for the application of EC and WP malathion formulations to blueberries. The lower rate (1.25# ai/A) being proposed by EPA is acceptable in cases where malathion is being tank mixed with other insecticides; however, when malathion is used alone for aphid control the 1.25# ai/A rate is not effective. Aphids transmit disease in blueberries thus adequate control is an important issue to growers. Malathion is an important chemical to PNW blueberry growers because of the short PHI, the low cost, and its relatively low toxicity. Originally we had asked EPA to allow 3 applications of malathion per year to blueberries; however, if the choice is between three applications per year at 1.25# ai/A and two applications per year at 2# ai/A, growers would prefer that EPA allow two applications at 2# ai/A and decrease the allowable applications from 3 to 2. We are asking that EPA reconsider the mitigation measures proposed in the malathion RED and increase the use rate for non-ULV malathion formulations to 2# ai/A for blueberries.

**CHERRY**
As stated in the attached letters, in both Oregon and Utah, cherry growers rely on malathion for cherry fruit fly (CFF) control. Because CFF is a quarantine pest, control is of utmost importance to growers. While Utah tart cherry growers are happy with the number of malathion applications EPA is proposing to allow on cherries, Oregon sweet cherry growers are not. Over the years
there has been much interest in extending the sweet cherry season and more orchard acreage has
been planted with new later-ripening varieties. Currently it is estimated that 70% of Oregon’s
14,000 acres of sweet cherries are planted with early- to mid-ripening varieties such as Bing,
Royal Anne, Corum, Bada, Chelan, Sandra Rose, Sonata, Tieton, Benton, and Van. (Bing,
Sandra Rose, Solata, Benton, and Van are all mid-ripening varieties while the others are early.)
The remaining 30% of Oregon’s sweet cherry acreage is planted with late-ripening varieties such
as Black Republican, Lambert, Lapins, Ranier, Attika, Regina, Selah, Skeena, Sweetheart,
Staccato, and Sunset Bing. While six applications of malathion will provide adequate CFF
control for the early- and mid-ripening varieties, the late-ripening sweet cherries require more
than 6 malathion applications for adequate control. Late-ripening cherries pit harden and begin
to soften, becoming susceptible to CFF, at the same time as earlier-ripening varieties. Because
cherries require weekly malathion applications for CFF control from the time the fruit softens
until harvest, and because these varieties ripen so much later than the earlier varieties, more
malathion applications are required for adequate CFF control for the later-ripening varieties. For
example Sweetheart cherries ripen 21 days after Bings and Staccato ripen 7 to 10 days after
Sweethearts. If Bings require 6 applications for adequate CFF control then Sweetheart cherries
require 9 applications and Staccato can require up to 11 malathion applications. Thus, we are
asking that EPA allow 11 applications of malathion per year to late-ripening cherries for CFF
control.

Washington’s sweet cherry growers have shifted to relying on spinosad (GF-120 Naturalyte Fruit
Fly Bait) for CFF control. Oregon growers, however, do not yet view this use of spinosad as a
proven technology. While there is some use of spinosad in Oregon buffer zones, growers are
reluctant to switch to using spinosad until more testing has been conducted. Oregon cherry
growers now rely on an area-wide control program for CFF control that is based on the aerial
application of malathion. This program has proven successful and, because CFF control is such
an important issue, growers are reluctant to switch to alternate control methodologies. Until
additional testing has been conducted showing that spinosad provides reliable, cost-effective
CFF control in Oregon’s sweet cherry growing areas, Oregon growers will continue to rely on
weekly aerial applications of malathion. We are asking that EPA allow up to 11 aerial
applications of malathion per season to the 30% of Oregon’s sweet cherry acreage comprised of
late-ripening varieties.

TREES GROWN FOR PULP
In our area cottonwood and poplar trees are grown in tree plantations for pulp and wood
production. Both the Oregon Department of Agriculture and the Washington State Department
of Agriculture have issued SLNs (OR-000016 and WA-960004) that provide for the use of
malathion in cottonwood/poplar plantations for grasshopper control. This use was not addressed
in the malathion RED.

PASTURE/RANGELAND
We previously raised the issue of whether or not the 1-day PHI being proposed for malathion use
on pastures and rangeland equated to a 1-day grazing restriction. If so this will be problematic
for malathion use for grasshopper control on rangeland as it is impractical to remove cattle from
rangeland when treating for insects.
As additional background information, please find attached to this letter the malathion comment letters that the PNW Workgroup has previously submitted to USDA. Please contact me if you have further questions or require additional information about malathion use in the PNW.

Sincerely,

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