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Subject: Malathion: Proposed Risk Mitigation Measures for Non-ULV Formulations

The following information is provided to you from the Western Integrated Pest Management Center regarding your April 6 request for input on EPA's proposed mitigation measures for non-ULV (EC and WP) malathion formulations. EPA has proposed changes regarding maximum single application rates, maximum number of applications allowed per year, minimum application intervals, pre-harvest intervals (PHI), and re-entry intervals (REI) for over 100 crops. This response provides input from Alaska, Idaho, Montana, Oregon, Utah, and Washington and focuses on the malathion uses that were discussed in our July 16, 2004 response to your earlier request for malathion use information.

Caneberries

EPA's proposed mitigation measures for use of malathion on various caneberry crops raised the following questions with crop experts in the PNW:

- What is the rationale for proposing a 4-day REI for Boysenberries when a 1-day REI is being proposed for the other caneberries? There is no reason that the REI for Boysenberries should be longer than the other caneberries, as the crop is grown virtually the same as the blackberries.

- What is the rationale for limiting the number of applications allowed to be made per season to Boysenberries, Loganberries, and raspberries to two while EPA is proposing that four applications per season are permitted for blackberries?

Growers are pleased that EPA is retaining the 1-day PHI.

Growers do require the use of more than two applications of malathion per season for all caneberries. While our July 2004 comment package indicated one or two applications per season were needed, further inquiries revealed that some growers require three or four applications per season for pest control. In raspberries malathion is typically applied both before and after harvest. (The after-harvest application is to reduce nuisance pests in the field prior to workers

entering to prune canes.) However, because of malathion's short PHI, this insecticide is also important should an aphid problem arise during harvest. Raspberries are harvested 12 to 15 times a season at 36 to 48-hour intervals.

We are asking that EPA establish a 1-day REI for all caneberries and allow four malathion applications per season for all caneberries.

Cherry

As we stated in our earlier malathion response, there is a difference in malathion use in cherries across our region with many Oregon and Washington growers using the ULV formulations and most growers in Utah using non-ULV formulations. In all areas however, malathion is a critical tool for the control of cherry fruit fly, which is a quarantine issue. Cherry fruit flies appear at harvest and the fruit requires constant protection from the time the insects first appear in traps and the fruit has begun to soften and ripen until harvest is complete. Because adult cherry fruit flies lay eggs under the skin of ripening fruit, the purpose of the malathion application is to control adult fruit flies prior to egg laying. Malathion has about a 3-day residual for cherry fruit fly control. If a grower needed to make a malathion application more than three days before harvest, with EPA's proposed retreatment interval, they would be unable to make another malathion application prior to harvest and there would be cherry fruit fly reinfestation. In requiring a 7-day retreatment interval EPA is removing the utility of malathion for cherry fruit fly control.

We are asking that EPA reduce the retreatment interval for malathion use on cherries from seven days to three days.

We look forward to having the opportunity to comment on EPA's mitigation proposals for the ULV formulations when these become available.

Mint

EPA's proposal to increase the REI for malathion use on mint to two days is problematic for PNW mint growers. Growers require field access following a malathion application to set irrigation lines and the proposed 2-day REI is too long. Representatives for the industry suggest a 24-hour REI which would be workable for growers.

Parsnip, Rutabaga, and Turnip

Oregon parsnip, rutabaga, and turnip growers were queried about the proposed malathion changes and they expressed no concern with the mitigation measures being proposed by EPA. Now that growers have the use of imidacloprid (Admire/Provado) and are finding it to be an effective control, they are not relying on the use of malathion as much as in the past.

Pasture/Rangeland

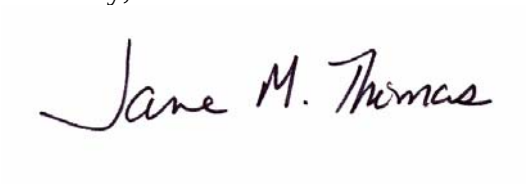
When queried, Extension personnel responded that EPA's proposals to cut the malathion use rate for pasture and rangeland in half and to limit applications to once per year would "practically eliminate the use of malathion as a rangeland/pastureland insecticide." Experts believe that lowering the use rate will reduce the effectiveness of malathion applications such that it will no longer be used on pasture and rangeland.

Strawberry

Although imidacloprid (Admire/Provado) and thiamethoxam (Actara) have proven effective for aphid control in strawberries, growers wish to retain the use of malathion on this crop for resistance management. Growers have no objections to any of EPA's proposed mitigation measures for malathion use on strawberries, only commenting that the proposed 3-day PHI was the longest that would be practical.

I hope you find this information useful. I am also attaching a contact list for your use should you have further questions.

Sincerely,



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Contact List

Malathion: Proposed Risk Mitigation Measures for Non-ULV Formualtions

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