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**Response to Napropamide (Devrinol) Use in California**

Date: August 23, 2005

To: [Harold D. Coble](#)  
Agronomist  
USDA/ARS/OA

From: [Rick Melnicoe](#)  
Director, Western Region Integrated Pest Management Center

Dear Harold,

Thank you for allowing comment on the proposed napropamide mitigation measures.

There are some errors in the [letter](#) regarding the percent of acres treated with napropamide in California. Several listed crops do have more than 5% of the total acres treated. This indicates needed uses and these should not be deleted from the label. In California the following crops use napropamide on more than 5% of the acres: Basil, Blackberry, Blueberry and Persimmon. This information was obtained from the California Pesticide Use Report for 2003 (the most recent year available).

The recommended use rates do not appear to pose a problem, as they are not exceeded in the reported use.

Sincerely,

Rick

[Rick Melnicoe](#)  
Director, Western Region Pest Management Center  
Director, Office of Pesticide Information and Coordination (UC Statewide Pesticide Coordinator)  
One Shields Avenue  
University of California  
Davis, CA 95616-8588  
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Date: August 21, 2005

To: [Rick Melnicoe](#)  
Director, Western Region Integrated Pest Management Center

From: [Harold D. Coble](#)  
Agronomist  
USDA/ARS/OA

Subject: Mitigation Proposal/Napropamide

Here is EPA's mitigation proposal on napropamide. If anyone has any concerns, let me know. Looks OK from my perspective based on what I have heard from out in the field.

Letter (attachment)

[Mitigation Proposal on Napropamide](#) (Microsoft Word)



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 19, 2005

Ann M. Tillman  
United Phosphorus, Inc.  
423 Riverview Plaza  
Trenton, NJ 08611

RE: Napropamide Mitigation Proposal

Dear Ms. Tillman:

As you are aware, we are in the final stages of the reregistration eligibility determination process for the herbicide napropamide, with a final Reregistration Eligibility Decision (RED) scheduled for September 2005. EPA's risk assessment for napropamide shows no significant human health risks, however, there are ecological risks of concern to mammals and plants and endangered species risks to aquatic organisms, mammals, and plants. As a result, various mitigation measures are necessary to reduce the ecological risks associated with the use of napropamide.

Below is a list of the mitigation measures necessary to address the ecological risks of concern:

*Voluntarily cancel pistachio, walnut, blackberry, boysenberry, loganberry, raspberry, blueberry, grapefruit, lemon, nectarine, orange, tangerine, tangelo, apricot, cherry, peach, plum, prune, apple, pear, fig, persimmon, avocado, pomegranate, artichoke, olive.* Based on the ecological risk assessment, these uses pose high risk to the environment. In addition, the Agency believes that napropamide is not being used extensively whereas data indicates that  $\leq 5\%$  crops are treated. Therefore, we assume these crops have low benefits. Consequently, EPA sees little utility in maintaining these uses and recommends their cancellation.

*Limit the number of applications to once per year for all remaining uses and clarify pre-harvest intervals (PHI).* Based on a proposal your company submitted on May 13, 2005, it was stated that United Phosphorus Incorporated (UPI) would limit the number of applications in most crops to once per year. In addition, UPI further stated that it will propose appropriate intervals from crops where no PHI is listed on certain labels.

*Decrease the maximum application rate.* The Agency initially followed up with UPI and USDA regarding the actual use rates for napropamide commodities. Based on that correspondence, a number of label changes were proposed by your company:

- Reduce the maximum rate on cranberries from 15 lb ai/A to 9 lb ai/A
- Reduce maximum rate for all food crops to 4lbs ai/A
- Reduce the maximum rate on turf to 2 lbs ai/A.

The Agency accepts these recommendations. In addition, the Agency proposes that your company reduce the maximum rate for ornamentals from 6lbs ai/A to 4 lbs ai/A. Agency usage data suggest that 4 lbs rates are being used by growers.

In the proposal your company submitted on May 13, 2005, it was stated that UPI has decided not to support the use on coffee beans and cucurbits. The Agency intends to revoke tolerances for coffee beans and cucurbits.

There are some gaps in the database that require the submission of additional napropamide studies. To complete the database, the following studies will be included in the napropamide data-call in that will be issued with the napropamide RED:

- 860.1340 Residue Analytical Method - Plants.
- 860.1500 Crop Field Trials are required for the following commodities: citrus fruits, pome fruits, stone fruits, berries, and tree nuts as well as on the individual crops of avocado, cranberry, fig, grape, kiwifruit, olives, persimmon, and strawberry.
- 860.1520 Magnitude of Residue in Processed Food/Feed (Coffee).
- 830.1550 Product Identity and Disclosure of Ingredients (composition and chemical identity)
- 830.1600 Starting Materials & Manufacturing Process (Description of Beginning Materials Used to Produce the Product)
- 830.1620 Description of the Production Process
- 830.1700 Preliminary Analysis
- 830.1750 Certified Limits (Certification of Limits)
- 830.1800 Enforcement Analytical Method (Analytical methods to verify certified limits)
- 830.6313 Stability to Normal and Elevated Temperatures, Metals and Metal Ions (stability)

- 830.7050 Ultraviolet/Visible Absorption  
850.1300 Daphnid Chronic Toxicity Test (early life stage in fish)
- 850.1350 Mysid (Shrimp) Chronic Toxicity Test (life cycle in aquatic invertebrates)
- 850.1500 Fish Life Cycle Study
- 850.4400 Aquatic Plant Toxicity Test Using the Following Species: *Lemna gibba*,  
*Skeletonema costatum*, *Anabaena flos-aquae*, and a freshwater diatom such as  
*Navicula pelliculosa*.

We would like to schedule a meeting or conference call later this month to continue our dialogue regarding the mitigation proposal and data gaps. Given our schedule for completing the RED next month, it is important that this discussion take place as soon as possible, preferably before the end of August. Please contact me as soon as possible to discuss scheduling this meeting.

I have shared this letter with Harold Coble of USDA's Office of Pest Management Policy, and we hope to have USDA's participation in any future mitigation discussions.

Thank you for your continued cooperation. Please contact me with any questions or concerns at (703) 305-9542 or [fuller.demson@epa.gov](mailto:fuller.demson@epa.gov)

Best Regards,

Demson Fuller

Chemical Review Manager

C: Harold Coble, USDA