

Subject: Re: Oxamyl
Date: Thursday, September 27, 2018 at 2:19:26 PM Pacific Daylight Time
From: James Jay Farrar
To: Epstein, David - OCE
CC: Matt Enrico Baur
Attachments: image001.png, image002.png, image003.png, image004.jpg

Hi David-

Based on your information about supply problems with oxamyl in 2015 and 2016, I looked more closely at the history of oxamyl use in lbs AI and acres treated. We don't have the 2017 data yet so I don't know if use returned to the 2014 levels.

I did get input from one additional UCCE Advisor. He noted that celery growers would use oxamyl if available but have found alternative methods.

Table 7: (continued) *The reported pounds of pesticides used that are organophosphor pesticides.*

AI	2007	2008	2009	2010	2011
METHYL PARATHION	75,385	34,110	25,770	21,512	22,819
METHYL PARATHION, OTHER RELATED	3,960	1,792	1,355	1,132	1,187
MEVINPHOS	30	4	9	24	118
MEVINPHOS, OTHER RELATED	20	3	6	16	79
MEXACARBATE	0	0	0	0	0
MOLINATE	75,241	19,653	12,516	24	<1
NALED	132,528	172,632	162,530	174,280	199,123
OXAMYL	45,096	100,000	48,994	118,048	136,967
OXYDEMETON-METHYL	122,723	111,612	68,576	71,290	26,013
PARATHION	479	33	118	248	196

Table 8: (continued) *The reported cumulative acres treated with pesticides that are organocholinesterase-inhibiting pesticides.*

AI	2007	2008	2009	2010	2011
METHYL PARATHION	45,173	21,574	15,198	13,046	13,243
METHYL PARATHION, OTHER RELATED	45,165	21,331	15,053	13,029	13,226
MEVINPHOS	198	34	69	11	108
MEVINPHOS, OTHER RELATED	198	34	69	11	108
MEXACARBATE	0	0	0	0	0
MOLINATE	17,476	4,529	2,942	6	<1
NALED	107,774	105,505	128,415	145,147	163,388
OXAMYL	60,773	116,202	59,118	134,931	150,265
OXYDEMETON-METHYL	161,835	140,760	82,368	86,131	27,438
PARATHION	414	101	195	51	68
PARATHION, OTHER RELATED	231	25	49	48	<1

Best regards – Jim

Jim Farrar, Director
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From: "Epstein, David - OCE" <David.Epstein@OCE.USDA.GOV>
Date: Tuesday, September 25, 2018 at 4:24 AM
To: James Jay Farrar <jffarrar@ucanr.edu>
Subject: RE: Oxamyl

Jim, again, thanks. Not sure if you are aware, but the decline in use of oxamyl in 2015 was principally due to a global shortage; from 2015-2016 stocks were depleted after a chemical leak at DuPont's TX factory shut down production.

D

From: James Jay Farrar <jffarrar@ucanr.edu>
Sent: Monday, September 24, 2018 3:12 PM
To: Epstein, David - OCE <David.Epstein@OCE.USDA.GOV>
Cc: Matt Enrico Baur <mebaur@ucanr.edu>
Subject: Re: Oxamyl

Hi David-

Thank you for asking about the EPA proposed interim decision on oxamyl and its potential impact on California growers.

I examined the CDPR PUR data on oxamyl and requested feedback from several UCCE Advisors. Oxamyl use in California has declined significantly in recent years from 136,967 lbs AI in 2011 to 2,466 lbs AI in 2016. Of the crops you listed, there was some use of oxamyl in celery and tomato in 2016 (see attached page 669 of the 2016 PUR report). The UCCE Advisors who responded thought that there were good alternatives to oxamyl in celery and tomato.

Best regards - Jim

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From: "Epstein, David - OCE" <David.Epstein@OCE.USDA.GOV>

Date: Tuesday, September 11, 2018 at 6:17 AM

To: James Jay Farrar <jjfarrar@ucanr.edu>

Subject: FW: Oxamyl

Jim,

EPA has issued its proposed interim decision (PID) on the registration review of oxamyl (Vydate). Proposed label mitigations include:

- “Remove the following use sites from oxamyl labels **celery, eggplant, peanut, tobacco, tomato, orchard uses (except for non-bearing citrus and banana/plantain).**”

I am preparing written response comments on the PID, and wanted to know your thoughts on how the loss of oxamyl will affect CA production of the above named crops (if you are not the person to address this, who can I speak with). Thank you for your time and consideration.

Regards,
Dave

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Department of Pesticide Regulation
2016 Annual Statewide Pesticide Use Report
Indexed by Chemical

Chemical Commodity	Pounds Applied	Agricultural Applications	Area Treated	Unit Type
OXADIAZON				
Research Commodity	0.72			
Rights Of Way	61.79			
	0.60	1	1.00	A
Total Pounds On This Commodity	62.39			
Structural Pest Control	0.48			
Turf/Sod	541.17	14	233.49	A
Chemical Total	5,008.64	501		
OXALIC ACID				
Landscape Maintenance	4.04			
N-Grnhs Plants In Containers	0.39	1	10,000.00	S
Chemical Total	4.43	1		
OXAMYL				
Bean, Succulent	5.97	2	4.00	A
Cantaloupe	14.93	1	30.00	A
Celery	287.16	51	382.00	A
Cotton	1,102.63	15	1,146.20	A
N-Outdr Plants In Containers	0.04	1	1,872.00	S
Onion, Dry	529.63	20	1,080.00	A
Pepper, Fruiting	223.61	33	317.32	A
Potato	102.55	3	152.00	A
Research Commodity	34.10			
Squash, Summer	1.99	1	14.00	A
Tomato	22.37	8	31.59	A
Tomato, Processing	139.38	2	140.00	A
Watermelon	2.11	1	4.25	A
Chemical Total	2,466.48	138		
OXYDEMETON-METHYL				
Broccoli	419.85	75	847.05	A
Brussels Sprout	1,568.96	204	3,452.48	A
Cabbage	31.44	8	62.00	A
Cauliflower	37.80	7	76.63	A
Corn, Human Consumption	571.66	30	1,158.00	A
Landscape Maintenance	0.34			
Lettuce, Head	1,133.62	187	2,287.21	A
Chemical Total	3,763.67	511		
OXYFLUORFEN				
Alfalfa	654.86	32	1,275.68	A
Almond	363,959.76	20,454	934,790.44	A
Apple	903.53	82	1,405.78	A
Apricot	1,054.67	177	2,599.88	A
Artichoke, Globe	2,007.86	290	4,484.15	A