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Subject: **Docket ID Number EPA-HQ-OPP-2010-0028**  
**Oxamyl, Case 0253**  
Comments in Response to *Oxamyl Registration Review: Proposed Interim Decisions for Oxamyl*

The following comments are being submitted in response to the August 8, 2018 Federal Register notice announcing the availability and seeking public comments for EPA's proposed interim registration review decision for Oxamyl. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on current available use data of Oxamyl in Hawaii.

Oxamyl (Vydate, Return) is used by pineapple growers in Hawaii to control reniform (*Rotylenchulus reniformis*) and root knot nematodes (*Meloidogyne* sp.). Typical application rate is 0.5 – 1.0 gal/Acre. Oxamyl is applied twice a year with 6 months interval in between applications. A total of five (5) applications of Oxamyl over a 2 ½ year pineapple crop cycle is done through chemigation. The typical crop cycle for pineapple produces two harvests, plant crop (first harvest) and the ratoon (second harvest). In Hawaii, there is no alternative pesticides for Oxamyl use in pineapple for nematode control. Huge economic impact if this nematode management option will not be available due to nematode damage in the root system resulting to poor plant growth and poor fruit sizing.

Comments received from a representative of the pineapple growers in Hawaii.

Comments compiled and submitted by:

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