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Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2014-0051**

Comments in Response to *Registration Review; Pesticides Dockets* (Pyraclostrobin)

The following comments are being submitted in response to the June 25, 2014 *Federal Register* notice regarding EPA's opening of the public comment period for the registration review of pyraclostrobin. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on of the use of pyraclostrobin on orchid and seed crop production and golf course turf in Hawai'i.

Ornamental crops: potted orchids.

Pageant, a combination product of boscalid and pyraclostrobin is used in potted orchid production.

- Diseases controlled.
Pageant is used to control *Botrytis* diseases and anthracnose.
- Application rate.
0.144 lb pyraclostrobin/100 gallons as a soil drench. (Potted plant production; application rate per acre is not known.)
- Application timing.
Application is made in the fall season when symptoms of *Botrytis* and anthracnose first appear. Application is for prevention of further development and spread of disease. For some orchids, Pageant is part of a program using systemic fungicides for the few months before flowering. There is one application of Pageant per year. There are two specific groups of orchids for which Pageant is particularly important—one has a three-year crop cycle and the other has a five-year crop cycle.

Turfgrass: golf course turf.

- Diseases controlled.
In Hawai'i, pyraclostrobin products are used to brown patch, dollar spot, fairy ring, leaf spot, rust, Bermuda decline, and other turf diseases.
- Application rate.
The application rate varies with the disease being treated. For most of the diseases in Hawai'i, the range of application rates for most diseases is:
0.0062 lb ai/1,000 sq ft (0.270 lb ai/A) – 0.0112 lb ai/1,000 sq ft (0.488 lb ai/A)
- Application timing.
Application timing also varies with the disease being treated. The application interval is 14-28 days for most diseases.
- Maximum number of applications.
The number of applications varies with the disease being treated. Usually, there are no more than two (2) sequential applications per year. However, sometimes, there may be three (3) sequential applications required.

Corn.

- Diseases controlled.
Anthracnose leaf blight, common and southern rust, northern corn leaf spot and blight, grey leaf spot, southern corn leaf blight, and smut.
- Application rate.
0.19 lb ai/A
- Application timing.
Application timing varies. It is the crop stage that determines the first application of pyraclostrobin. Growers reported two different scenarios were reported: 1) the first (and only) application is at the V6 stage (six leaves fully expanded with visible leaf collars); and 2) first application at the R1 (silking) stage and a second application at R4 (dough, thickening of fluids inside kernels) stage. The calendar is not the determining factor of timing of pyraclostrobin for corn production in Hawai'i.
- Maximum number of applications.
For the two scenarios were reported above: 1) when pyraclostrobin is applied at the V6 stage, there is one (1) application per crop cycle; and 2) two (2) applications per crop cycle when applications are at the R1 and R4 stages.

Soybeans.

- Diseases controlled.
Brown spot, cercospora leaf blight, and soybean rust.
- Application rate.
0.19 lb ai/A
- Application timing.
If no disease evidence is observed, no applications are made. Otherwise, the crop stage

determines application timing: at R5 (beginning seed) - R6 (full seed). The calendar is not the determining factor of timing of pyraclostrobin for soybean production in Hawai'i.

- Maximum number of applications.
One (1) is the maximum number of applications for soybean production. (No applications are made if no disease pressure is present.)

This information has been provided by extension staff of the College of Tropical Agriculture and Human Resources of the University of Hawai'i at Mānoa and growers from Hawai'i's ornamental and seed crop production industries.

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