

Pesticide Information Request Response
Arid Southwest IPM Network
Arizona Supplemental Response to Fumigant Information Request
April 25, 2007

Comment:

A prior response to this information request was sent on April 4, 2007. After that submission, the included additional information was received from Arizona stakeholders.

Active Ingredients:

Chloropicrin, dazomet, metam potassium, metam sodium, and methyl bromide

Crops/Target sites:

List 1. Crops for which EPA anticipates assessing the impacts of risk mitigation.

Cantaloupes	Peppers
Carrots	Potatoes
Cucumbers	Squash
Eggplant	Strawberries
Forest Seedlings	Sweet Potato
Nursery Crops ¹	Tobacco
Onions	Tomatoes
Orchard Replant, California ²	Watermelons
Peanuts	

Extent of Response / Data Sources:

We received the attached letter and soil fumigant form from representatives of Del Monte Fresh Produce (Southwest), Inc., located in Goodyear, Arizona. This supplements the prior response to this information request forwarded on April 5, 2007.



Del Monte Fresh Produce (Southwest), Inc.

April 13, 2007

VIA FACSIMILE

Dr. Alfred J. Fournier
Maricopa Agricultural Center
University of Arizona
37860 W. Smith-Enke Road
Maricopa, Arizona 85239
Fax. (520) 568-2556

Re: EPA Review of Fumigants for Melons

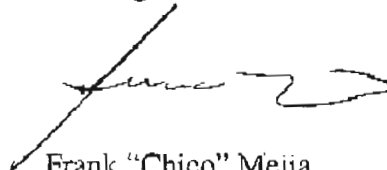
Dear Dr. Alfred J. Fournier,

Fumigation with Telone and Metham Sodium are the cornerstones of Del Monte melon production in Arizona on over 8,000 acres harvested annually. Agriculture in Arizona as well as other southwestern states is at a critical crossroads. There is intense competition for water because of an ongoing drought in the state coupled with a tremendous increase in the population. To cope with these challenges Del Monte has become an industry leader in agricultural technologies based on subsurface drip irrigation. To date there are close to 30,000 acres of drip irrigated melons in the state of Arizona which represents a lion's share of the total production on an annual basis. As a result of the scarcity of land and water we are forced to farm on the same ground for numerous years. The substantial investment of \$1,000.00 dollars / ac for drip irrigation forces us to grow our "cash" crop i.e. melons in a back to back rotation. In order to make this intensive rotation work we must fumigate between each crop. Instead of using methyl bromide we developed a melon program utilizing more environmentally friendly fumigants such as Telone and Metham Sodium.

We have used this approach successfully for the last 14 years and would hope that we could continue in the future.

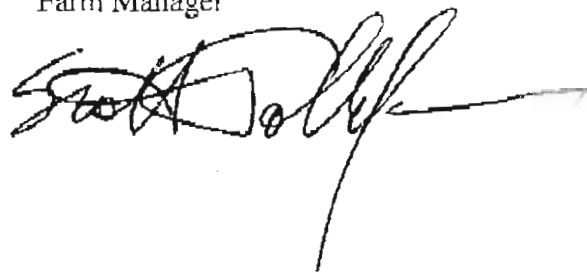
In our attempt to provide the American public with a safe and plentiful supply of fruits and vegetables we need your help in this very important matter.

Best regards,

A handwritten signature in black ink, appearing to read "Frank", with a long horizontal stroke extending to the right.

Frank "Chico" Mejia
General Manager

Scott Tollefson
Farm Manager

A handwritten signature in black ink, appearing to read "Scott Tollefson", with a long horizontal stroke extending to the right.

Soil Fumigant Data [Transcription of attached form]

Your Contact Information: Scott Tollefson, Delmonte Fresh Produce, (602) 708-6297

Crop or Crop Rotation: melons on melons; some melons rotated with cotton

Soil Fumigants Applied: Telone, Vapam (metam sodium)

Pest(s) Controlled: weed, nematodes and, most important, soil fungi

Percent Crop Treated by State, Region, or Area: 99% of our 8,000 acres

Application Rate: 5-7 gal/ac Telone and 8 gal/ac Vapam

Time of Year Application Made: Pre plant & post harvest

Method of Application: Drip Irrigation – 100% under plastic mulch

Typical Number of Acres Fumigated Each Day: 150 – 200 ac

Field Preparation—Flat, Strip, Bedded, etc.: Band application using subsurface drip lines buried 8-10" deep

Sealing Methods—Tarp, Water Seal, Etc.: 8-10" of pressed soil + plastic mulch

Best Alternative Controls: There are no alternatives because we are running out of land and water to rotate to. Our water allotments are being reduced because of the on going drought in the State of Arizona. Because of this, we are forced to use [soil fumigants]...limits rotations