

Proposed Ziram Revocations and Cancellations: Comments Sought by November 21, 2003

Date: October 22, 2003
To: Western Region State Contacts
From: Rick Melnicoe
Subject: Proposed Ziram Revocations and Cancellations

Dear Colleagues,

Below is an e-mail with attachments from Kent Smith regarding proposed Ziram revocations and cancellations. There are many crops that appear not to be supported. Please to respond to Kent on how this may affect commodities grown in the PNW.

Please copy me on any replies or you may send them directly to me to forward to Kent.

People in the PNW will be coordinating their response through Jane Thomas, the PNW Comments Coordinator.

Please try to have a response by **November 21, 2003**. Thanks.

[Rick Melnicoe](#)

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October 22, 2003

Dear Center Directors,

Yesterday, it came to my attention that all is not well with ziram. EPA is proposing revocation of 41 tolerances and **CANCELLATION OF ZIRAM USE ON 35 CROPS**. Unfortunately, they will not let me see their mitigation measures, so I am only getting information in dribs and drabs. They refuse to show the signed RED to me before it is published.

What makes this so irritating, is the fact that ziram has nearly a clean bill of health. EPA has no human tox concerns, a few worker concerns that can be solved with long pants and long sleeves, and some eco concerns for which they are reducing some rates (I already sent this to you).

The bottom line is the cost of residue testing. With a per tolerance cost of \$15-18,000, the registrants are unwilling to provide the residue data for most minor uses. The registrants have indicated that they may support the tolerances on 8 additional crops that are proposed for revocation (melons, squash, cucumbers, onions, cranberries, beans carrots, and strawberries). Also, IR-4 is looking at the possibility of supporting some of the disappearing tolerances.

What uses that are disappearing are important to agriculture? Please have your states and the appropriate specialists review the attached chart and let me know which crops (with proposed tolerance revocations) are important to agriculture.

Ziram chart with proposed revocations and cancellations:

- [MS Word Format](#)
- [Rich Text Format](#)

Regards,

[Kent L. Smith](#), Ph.D.

Plant Pathologist

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ZIRAM TOLERANCE EXCERPT FOR USDA.
10/20/03

Table 25. Tolerance Reassessment Summary for Ziram.

Commodity	Current Tolerance (ppm)	Tolerance Reassessment (ppm)	Comment & [Correct Commodity Definition]
Almonds	0.1	0.1	[Almond, nutmeat]
Apples	7	6	[Apple]
Apricots	7	20	[Apricot]
Beans	7	Propose revocation	
Beets, with or without tops	7	Propose revocation	
Beets, greens	7	Propose revocation	
Boysenberries	7	Propose revocation	
Brassica vegetable group	7	Propose revocation*	
Broccoli	7	Propose revocation	
Brussels sprouts	7	Propose revocation	
Cabbage	7	Propose revocation	
Carrots	7	Propose revocation	
Cauliflower	7	Propose revocation	
Celery	7	Propose revocation	
Cherries	7	6	[Cherry, sweet]; [Cherry, tart]
Collards	7	Propose revocation	
Cranberries	7	Propose revocation	
Cucumbers	7	Propose revocation	
Dewberries	7	Propose revocation	
Eggplants	7	Propose revocation	
Gooseberries	7	Propose revocation	
Kale	7	Propose revocation	
Kohlrabi	7	Propose revocation	
Lettuce	7	Propose revocation*	
Loganberries	7	Propose revocation	
Melons	7	Propose revocation	
Nectarines	7	Propose revocation	Residues in/on nectarines are covered by the tolerance for peaches
Onions	7	Propose revocation	
Peaches	7	7	[Peach]
Peanuts	7	Propose revocation	
Pears	7	6	[Pear]
Peas	7	Propose revocation	

Pecans	0.1	0.1	<i>[Pecan]</i>
Peppers	7	Propose revocation**	
Pumpkins	7	Propose revocation	
Quinces	7	Propose revocation	
Radish with or without tops	7	Propose revocation	
Radish tops	7	Propose revocation	
Raspberries	7	Propose revocation	
Rutabaga with or without tops	7	Propose revocation	
Rutabaga tops	7	Propose revocation	
Spinach	7	Propose revocation	
Squash	7	Propose revocation	
Strawberries	7	Propose revocation	
Summer squash	7	Propose revocation	
Tomatoes	7	2	Use is limited to East of Rocky Mountains; <i>[Tomato]</i>
Turnip with or without tops	7	Propose revocation	
Turnip, greens	7	Propose revocation	
Young berries	7	Propose revocation	
Tolerance To Be Proposed Under 40 CFR ' 180.116			
Almond, hulls	None	20	Tolerance petition pending
Apple, pomace, wet	None	TBD	Additional field trial data required
Blackberries	7	TBD	Additional data required; <i>[Blackberry]</i>
Blueberries	7	TBD	Additional data required;
Grapes	7	TBD	Additional field trials pending
Grape, juice	None	TBD	Additional field trial data required
Grape, raisin	None	TBD	Additional field trial data required

** IR-4 may be willing to support.

TBD To be determined