

April 6, 2021

Pesticide Registration Review; Draft Human Health and/or Ecological Risk Assessments for Several Pesticides; Notice of Availability EPA-HQ-OPP-2015-0061-0010. Propiconazole, indaziflam, and peroxy compounds are used most routinely in Hawaii and Pacific Islands.

**Indaziflam**, (Case 7288 EPA-HQ-OPP-2020-0587) is used here on the golf course as a crucial pre-emergent control for goose-grass, crabgrass, tropical signal grass and numerous other weeds. It is used 2-3 oz per acre, very low rates on our rough and fairways two to three times a year at the most. This pre-emergent has been a game changer for us at Waiehu with all the weed seeds which have been deposited into the soil over the last 4 decades, really helping us control newly developing weeds. Other pre-emerge products don't always work due to repetitive uses or lack of rotations this is one product for which we stay on a rotation with Oxadiazon as I do not wish to see resistance develop.

**Propiconazole**, (Case 3125 EPA-HQ-OPP-2015-0459) is the second ingredient in one of the Fungicides we use called Headway. Headway has Azoxystrobin Methyl 5.73% and Propiconazole 9.54%. This fungicide has been instrumental for us combating dollar spot, fairy ring, necrotic ring spot, take-all root rot, summer patch, brown patch, pythium blight, pythium root dysfunction, spring dead spot and leaf spot. All diseases that the majority of our warm season grass here in Hawaii can and do experience. These diseases are devastating to greens, tees and fairways. Big island is mainly using this for corn seed averaging 350 acres a year. One of the fungicides we currently use is Tilt whose active ingredient is Propiconazole. It is important as it is used in rotation with Quadris, group 11, to mitigate fungicide resistance. It is used multiple times throughout the life span of the crop to control rusts and leaf blights which if left unchecked would greatly reduce our yield.

**Peroxy Compounds**, (Case 6059EPA-HQ-OPP-2009-0546) I could be wrong but I believe that Sodium Carbonate Peroxyhydrate, Hydrogen Peroxide and Peracetic Acid might fall into this group? I am working on trying to get this product into Hawaii, Peroxy Punch as it contains two of the above listed chemicals. Used in the past successfully as a sanitizer, bacteria/fungicide it is effective against algae, bacteria and fungus. It is an organic listed fungicide on the OMRI list I believe.

**Mancozeb**, (Case 0643 EPA-HQ-OPP-2015-0291) is still very important in papaya production, especially on the big island. Important for controlling anthracnose and other fruit rots, Phytophthora blight, and even powdery mildew and black spot to a lesser degree.

Comments compiled and submitted by:

A handwritten signature in black ink, appearing to read 'NHFerris'. The letters are cursive and connected, with a prominent 'N' and 'F'.

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