

**Pesticide Information Request Response**  
**Arid Southwest IPM Network**  
**Arizona Pest Management Center**  
**March 6, 2009**

**Data Request:** Chemigation

**Subject:** Pesticide products applied through irrigation systems - EPA is seeking comments on a discussion paper as the agency is considering developing new guidance for the labeling of pesticide products applied through irrigation systems, or 'chemigation'.

**Date Sent:** December 22, 2008

**Comments Due:** March 6, 2009

**Background:** EPA invites any interested party to give the Agency preliminary, informal comments on the best approaches to take in developing useful guidance on "chemigation" labeling, before the Agency begins drafting a specific proposal that may be issued for public notice and comment. A "discussion paper" developed by EPA, OPP provided background information, additional details, and specific questions for comments.

**Process:** Al Fournier of the Arizona Pest Management Center (APMC) forwarded this request to members of the Arid Southwest IPM Network, which includes AZ, NM, NV and Southern CA participants. We also sent specific requests, via phone and email, to individuals with specific knowledge or experience in this area, including irrigation specialist, agricultural engineers and Arizona Department of Agriculture pesticide regulatory officials. Collected comments are summarized below.

**Response for Arizona**

Chemigation is an important practice in Arizona agriculture and the problems cited by the prior governing documents are accurate. The old guidance document was stifling what otherwise would have been legal uses in irrigation systems (esp. drip).

We are not aware of any of state-approved list of chemigation equipment or designs. The national standards from the American Society of Agricultural and Biological Engineers (ASABE), published in February 2004, provide technical information for maintaining chemigation systems to minimize the risk of water pollution.

No comments were provided by our out-of-state contacts.