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U.S. Environmental Protection Agency
OPP Docket, EPA Docket Center (EPA/DC), 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Prometryn, EPA Docket ID: EPA-HQ-OPP-2013-0032

To Whom It May Concern:

The Arizona Pest Management Center is host to the University of Arizona's expert IPM scientists including Ph.D. entomologists, weed scientists and plant pathologists with expertise in the strategic tactical use of pesticides within IPM programs that protect economic, environmental and human health interests of stakeholders and the society at large. In coordination with the Western Integrated Pest Management Center, we contribute to federal comments on issues of pest management importance to stakeholders throughout the desert southwest including Arizona, New Mexico, Nevada, Colorado and the southeast desert regions of California.

At this time, we wish to respond to the Agency's Proposed Interim Decision for the herbicide Prometryn, EPA Docket number EPA-HQ-OPP-2013-0032, on behalf of Arizona agricultural stakeholders. These comments are distilled from stakeholder input received from University of Arizona Extension Specialists and licensed Pest Control Advisors in the state of Arizona, and a review of reported use of prometryn in recent years by examination of the Arizona Pest Management Center Pesticide Use Database.

We provided comments at an earlier stage of registration review, documenting the importance of prometryn to the production of several economically important crops, including cotton, celery, fennel, cilantro, parsley and carrots (Docket ID number EPA-HQ-OPP-2013-0032-0043). These comments are deposited in the docket and are also available on our website at: https://cals.arizona.edu/apmc/docs/ Prometryn_Use_AZ.pdf

Stakeholders were pleased to learn that prometryn, an important herbicide for several of our crops, will remain a viable registered option for growers of these crops. For crops such as cilantro, fennel, celery and carrots, prometryn remains critical, as there are very few other viable options available for weed control.

Proposed Rate Change for Celery. Based on a review of the APMC Pesticide Use Database and discussions with pest control advisors, EPA's proposed lowering of the maximum application rate for celery from 3.2 lb ai/A to 2.0 lb ai/A does not appear to be problematic. From 2010 through 2017, the most commonly applied use rate in celery was 1.5 lb ai/A, accounting for over 80% of applications. Fewer than 1% of applications were at the 2 lb ai/A, and the balance of applications were at rates below 1.5 lb ai/A.

Increase Re-Entry Intervals (REI) to 48 hours for carrots, celery, parsley and fennel. Several pest control advisors with years of experience in these crops expressed a mixture of concern and acceptance regarding the proposed increase of REIs to 48 hours (from 12 on most crops). One PCA indicated that the increased REIs would be most problematic in direct seeded crops, where they sometimes need to have crews in the field not long after the application. This would include parsley, cilantro and carrots. In celery, the increased REI would be less of an issue, because nearly all celery is grown from transplants. Current production practices sometimes require people to re-enter the field sooner than 48 hours following at-planting herbicide applications, for example, to deal with irrigation. Products with a lower REI, all other things equal, are often favored for this reason. The relative lack of other herbicide options in crops such as cilantro, fennel and parsley would make these production issues more challenging. One respondent indicated that a 24-hour REI for this herbicide would be more workable in these crops. It was also suggested that higher REIs could negatively impact crop production, making it more difficult to compete with international markets such as Mexico. A PCA who works with carrot growers indicated the 48-hour REI would be workable for them. In general, PCAs indicated, sometimes following discussions with growers, that they would adjust to these increased REIs as needed, and more than one expressed relief that this critical herbicide would remain available to their growers.

Please feel free to contact me with any questions.

Reference: Previous APMC comments on prometryn:

Fournier A.J., P.C. Ellsworth, W.A. Dixon II. 2017. Prometryn Use in Arizona Crops. University of Arizona, Arizona Pest Management Center.
https://cals.arizona.edu/apmc/docs/ Prometryn_Use_AZ.pdf

Sincerely,

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