

APPENDIX B. Verification memo for Naled



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

PC Code: 034401

DATE: January 14, 2010

SUBJECT: Verification Memorandum for Naled for SF Bay Species

FROM: Cathryn O'Connell, Team Leader
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AND
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THRU: Margaret Rice, Branch Chief
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AND
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TO: Rafael Prieto
Usage and Label Use Team
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This memorandum serves to provide additional information on the use pattern of naled not captured in the LUIS process. RD and PRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and PRD.

PRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. The CRM and PM have drafted the "Registration and Reregistration Verification" section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

Finally, if further clarification is needed please contact Cathryn O'Connell and Rita Kumar.

Registration and Reregistration Verification

Date and Scope of the RED

- The Interim Reregistration Eligibility Decision (IRED) for naled was completed in 2002.
- In July 2006 the Reregistration Eligibility Decision (RED) for naled was finalized upon completion of the Organophosphate (OP) Cumulative Risk Assessment.

Required Through the RED Process

- Rate and other product changes required in the naled IRED:
 - Reduce the maximum application rate for use on almonds and peaches to 1.875 lbs ai/A and prohibit aerial use on almonds and peaches.
 - Prohibit ready to use formulations.
 - Delete wet and dry bait uses.
 - Delete spot treatment for cockroach control.
 - Prohibit all residential uses either by resident or professional applicator. Use in residential areas by mosquito control districts would still be allowed.
 - Reduce application rates for control of black fly from 0.25 to 0.1 lbs/ai/A, and reduce rates on peaches and almonds from 2.8 to 1.875 lbs/ai/A.
 - Require buffer zones around permanent bodies of water to reduce runoff.
 - Establish spray setbacks to reduce spray drift for agricultural uses.
- Labels have been amended to include the risk mitigation measures required in the 2002 IRED. **Table 1** contains a list of all active registrations and a list of the dates of the last stamped label. All of the maximum application rates for naled products are listed in **Table 2**.
- In one case, a product includes incorrect information. The product Prokil Naled Insecticide (Reg. no. 10163-46) is a 100% repack of Dibrom 8 Emulsive (5481-479). All use patterns, application rates, and use restrictions are being revised by the registrant to reflect those on the Dibrom 8 label. A letter instructing the registrants to make those changes was signed on 12/3/09. The registrants are expected to submit revised labels by the end of January 2010.

Naled Uses (California Focus - Based on Available Labels):

Table 1 Current Naled Product Registrations

FORMULATION	REG. NO. (date latest label)	% ai	METHODS OF APPLICATION	USE RESTRICTIONS
Naled Technical	5481-478 (06/22/07)	94.5%	-----	For formulation of naled insecticide products only.
Dibrom 8 Emulsive SLNs: CA000006 CA050011	5481-479 (2/13/08)	62% ai 7.5 lbs naled/gallon	Ground Aerial Handheld	- Do not apply through any type of irrigation system - Do not apply by ground equipment within 25 ft, or by air within 150 feet, or by airblast within 50-100 feet of lakes, reservoirs, rivers, permanent streams, marshes, or natural ponds; estuaries, and commercial fish ponds, where wind is blowing or gusting toward these areas. - Do not cultivate within 10 feet of the aquatic area so as to allow growth of a vegetative filter strip to alleviate drift and mitigate runoff.
Dibrom Concentrate SLN: CA860005	5481-480 (8/14/09)	87.4% ai 13.2 lbs naled/gallon	Ground Aerial	- Spray during periods when the wind speed is between 1 and 15 mph at ground level and when thermal activity is low. - Do not apply when ambient temperature is less than 50 deg F. - Do not apply when it is raining in the treatment area.
Trumpet EC	5481-481 (2/28/08)	78% ai 10.8 lbs naled/gallon	Ground Aerial Handheld	- Spray during periods when the wind speed is between 1 and 15 mph at ground level and when thermal activity is low. - Do not apply when ambient temperature is less than 50 deg F. - Do not apply when it is raining in the treatment area.
Fly Killer D	5481-482 (3/6/08)	36% 3.5 lbs naled/gallon	Ground Aerial Handheld	- Do not apply within 24 hours following rainfall or irrigation, or in areas where intense or sustained rainfall is forecasted to occur within 24 hours.
Prokil Naled Insecticide	10163-46 (12/6/07)			This is a 100% repack of Dibrom 8 (Reg. 5481-479). The uses and rates are the same as that label. A revised label is expected from the registrants by Jan. 2010.

Table 2 Naled Use Information

Use Site	Formulation	Maximum Application rate	Minimum Retreatment Interval	Maximum No. of Applications	Maximum application rate/year
Alfalfa	CA000006	1.4 lbs ai/A	7 days	3	4.2 lbs ai/A
Almond (ground only)	Dibrom 8 Emulsive	1.9 lbs ai/A	---	1 (dormant or dormant delayed, only)	1.9 lbs ai/A
Beans, lima beans and Peas (dry and succulent form)	Dibrom 8 Emulsive Prokil Naled Insecticide	Ground: 1.4 lbs ai/A Aerial (CA only): 0.9 lbs ai/A	7 days	5	4.2 lbs ai/A
Broccoli, cabbage (includes tight head varieties of Chinese cabbage), cauliflower, Brussels sprouts, kale, and collards	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A (Florida: 0.9 lb a.i./A)	7 days	5	9.4 lbs ai/A
Cantaloupes, muskmelons	Dibrom 8 Emulsive	0.9 lbs ai/A	7 days	---	1.9 lbs ai/A
Celery	Dibrom 8 Emulsive Prokil Naled Insecticide	1.4 lbs ai/A	7 days	5	7.0 lbs ai/A
Cotton	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	7 days	---	4.7 lbs ai/A
	SLN CA050011 (Dirbom 8)	1.4 lbs ai/A	---		
Eggplant, peppers	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A	7 days	5	5.6 lbs ai/A
Grapes (ground only)	Dibrom 8 Emulsive Prokil Naled Insecticide	Groundboom: 0.6 lbs ai/A Airblast (CA only): 0.9 lbs ai/A	---	---	5.6 lbs ai/A
Hops	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	14 days	5	4.7 lbs ai/A

Use Site	Formulation	Maximum Application rate	Minimum Retreatment Interval	Maximum No. of Applications	Maximum application rate/year
Melons (grown for seed only)	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	7 days	2	1.9 lbs ai/A
Oranges, lemons, grapefruit, tangerines	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A	7 days	5 (aerial only)	5.6 lbs ai/A
Peaches (ground only)	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A	---	1 (dormant or delayed dormant)	1.9 lbs ai/A
Safflower (CA and AZ only)	Dibrom 8 Emulsive Prokil Naled Insecticide	2.1 lbs ai/A	7 days	2	4.2 lbs ai/A
Strawberries	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	7 days	5	4.7 lbs ai/A
Sugar beets	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	7 days	5	4.7 lbs ai/A
Summer squash	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A	7 days	5	5.6 lbs ai/A
Swiss chard (ground only)	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	7 days	7	7.0 lbs ai/A
Walnuts	Dibrom 8 Emulsive Prokil Naled Insecticide	1.9 lbs ai/A	7 days	4	3.8 lbs ai/A
Forest and shade trees, ornamental shrubs and flowering plants (Ground only)	Dibrom 8 Emulsive Prokil Naled Insecticide	0.9 lbs ai/A	---	---	Repeat as necessary
Roses and other ornamental plants (hot plate application)	Dibrom 8 Emulsive Prokil Naled	0.06 lb ai/10,000 cu ft.	4-7 days	2-4	Repeat as necessary

Use Site	Formulation	Maximum Application rate	Minimum Retreatment Interval	Maximum No. of Applications	Maximum application rate/year
	Insecticide				
In and around food processing plants, loading docks, cull piles, refuse areas. (ground only)	Dibrom 8 Emulsive Prokil Naled Insecticide	0.1 lb ai/2.5 gallons water	5-7 days	---	Repeat as necessary
Livestock Pastures including Dairy Cattle.	Dibrom 8 Emulsive Prokil Naled Insecticide	Aircraft: 01. lb ai/A Mist or cold fog: 0.1 lb ai/A	---	---	---
For reduction of livestock pests in confined animal feeding operations (e.g., corrals, holding pens, feedlots) containing dairy and beef cattle, hogs, sheep, or horses	Dibrom 8 Emulsive Prokil Naled Insecticide	Aerial: 0.1 lbs ai/A Ground: 0.1 lbs ai/A	7 days (only for ground applications)	---	---
For reduction of pests in rangelands containing dairy and beef cattle	Dibrom 8 Emulsive Prokil Naled Insecticide	0.1 lb ai/A	7 days	---	---
In and around dairy barns, livestock barns, pig pens, poultry houses, feed lots, cattle pens, garbage dumps, outside meat packing establishments, pens, docks, ramps, disposal areas and cider mills (space spray only)	Fly Killer D	0.9 lbs ai/40 gallons water 0.006 lbs ai/2.5 gallons water	---	---	---
In and around food processing plants, loading docks, cull piles, and refuse areas and cider mills	Fly Killer D	2.2 lbs ai/100 gallons water 0.06 lbs ai/2.5 gallons water	---	---	---
Telephone or light poles (ground hand-spray only)	SLN CA860005 (Dibrom Concentrate)	1.14 lbs ai/gallon of attractant; 6 inches of material per bail station	2-4 weeks	600 bait stations/sq mile	Repeat spot applications until infestation has been eradicated
Wide Area Public Pest Control (mosquitoes, flies) Note: There are spray droplet size requirements for aerial and ground applications, specified on each product label.					
Agricultural Areas, Woodlands, Wide Area Public Pest Programs Sponsored by Government Entities (Consult state or tribal	Dibrom 8 Emulsive Prokil Naled Insecticide	Aircraft: 01. lb ai/A Mist or cold fog: 0.1 lb ai/A	---	---	---

Use Site	Formulation	Maximum Application rate	Minimum Retreatment Interval	Maximum No. of Applications	Maximum application rate/year
agency before applying; this application rate will kill shrimp, do not apply to tidal or marsh waters)					
Residential areas, municipalities, tidal marshes, swamps, woodlands, and agricultural areas	Dibrom 8 Emulsive Prokil Naled Insecticide Dibrom Concentrate Trumpet EC Insecticide	0.1 lb ai/A	24 hours	---	Dibrom 8 Emulsive: 0.22 lbs ai/week 10.4 lbs ai/year (180 oz.=10.5 lbs ai/yr) Dibrom Concentrate: 0.21 lb ai/week 10.73 lb ai/yr Trumpet EC Insecticide: 0.17 lb ai/week 10.73 lb ai/yr More frequent treatments may be made if determined necessary by a state, tribal, or local health or vector control agency.
Livestock pastures, including dairy cattle	Dibrom 8 Emulsive Prokil Naled Insecticide	0.1 lb ai/A	Dibrom 8 Emulsive: 7 days Prokil Naled Insecticide: 10 days (Note: 7 days is the required minimum retreatment interval)	---	0.22 lbs ai/week 10.4 lbs year (180 os = 10.5 lbs ai/yr) More frequent treatments may be made if determined necessary by a state, tribal, or local health or vector control agency.
Feed lots including dairy cattle, and pastures including	Fly Killer D	Aircraft: 0.06 lbs ai/A	7 days (unless monitoring demonstrates	---	---

Use Site	Formulation	Maximum Application rate	Minimum Retreatment Interval	Maximum No. of Applications	Maximum application rate/year
woodlands, swamps (direct application to water is prohibited)		Mist blower: 0.1 lb ai/A	that mosquitoes have re-infested the area)		

Registration Division Review

No changes have occurred in the use patterns since the last accepted dates indicated in **Table 1**, and nothing is pending.