

New York State Department of Environmental Conservation

Division of Solid & Hazardous Materials

Bureau of Pesticides Management, 11th Floor

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Website: <http://www.dec.state.ny.us/website/dshm/pesticide/pesticide.htm>

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Via E-Mail

July 20, 2006

Mr. Dan Rosenblatt
Team Leader
Document Processing Desk (7504P)
USEPA/Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Mr. Rosenblatt:

Re: Crisis Exemption Request for use of formetanate hydrochloride (Carzol SP, EPA Reg. No. 10163-265) to control onion thrips, *Thrips tabaci*, on dry bulb onions grown during the 2006 growing season in New York State

The New York State Department of Environmental Conservation, as the State lead agency for pesticide matters, hereby issues a Crisis Exemption under Section 18 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended for use of formetanate hydrochloride (Carzol SP, EPA Reg. No. 10163-265) to control onion thrips infestations in onion fields.

If onion thrips are not controlled with insecticides, infestations can destroy the onion crop. When conditions are hot and dry, onion thrips infestations are much more difficult to control and require many more insecticide applications than when conditions are cool and wet. When it is hot (e.g., 86° F), the period in which an onion thrips population completes one generation is reduced dramatically (just under two weeks) compared with when it is cooler.

Another major problem faced by onion growers in New York is onion thrips resistance to insecticides with pyrethroids, such as Warrior. Nearly 85% of onion fields are treated with Warrior and control failures are occurring frequently.

Onion thrips are known carriers of iris yellow spot virus (IYSV). Laboratory results have confirmed the presence of IYSV for the first time in New York.

A Specific Exemption Request was mailed to your office on June 22, 2006. Per a phone conversation on July 20, 2006 between Cyndi Crowley, of my staff, and Andy Ertman, the request will not be approved in time to be of use to the growers. The anticipated use season of this product is from July 24, 2006 to September 15, 2006 with harvest dates of August 30, 2006 through October 15, 2006. A 30-day preharvest interval will be observed.

Formetanate hydrochloride is requested for commercially grown dry bulb onions grown on high organic matter soils (muck) throughout New York State. Counties of use include Orange, Orleans, Genesee, Oswego, Madison, Lewis, Herkimer, Steuben, Yates, Ontario, Wayne and others consisting of a maximum 13,600 acres (none are grown on Long Island). Application by air or ground equipment is allowed on the existing Carzol SP Section 3 label. The application rate is one application not to exceed 1.25 lb formulated product (1.15 lb a.i./acre) per acre **or** two applications at 0.75 lb formulated product (0.69 lb a.i./acre) per acre per application, not to exceed 1.5 lbs formulated product per acre per season. Applications should be made no less than seven days apart. Total estimated amount of Carzol SP to be used is 20,400 lbs.

For purposes of label enforcement, a temporary tolerance of 0.2 ppm would be appropriate for the proposed use pattern.

Gowan Company, the manufacturer of Carzol SP, fully supports our efforts to obtain an emergency exemption for the use of Carzol SP on onions to manage onion thrips in New York State.

According to 6 NYCRR 326.2(a), formetanate hydrochloride is declared to be restricted to its purchase, distribution, sale, use and possession in New York State.

Please contact Cyndi Crowley, of our Pesticide Product Registration Section, at (518) 402-8768, if you require further assistance on this request.

Sincerely,

Maureen P. Serafini
Director
Bureau of Pesticides Management

ecc: A. Britten, USEPA
W. Smith, Cornell University, PMEP
R. Zimmerman/R. Mungari, New York State Dept. of Ag. & Mkts.

CC:clo

bcc: C. Crowley
Product File
Daybook

s18.formetanatecrisis.wpd

CLASSIFIED FOR
"RESTRICTED USE"
IN NEW YORK STATE
UNDER 6NYCRR PART 326

SECTION 18 EXEMPTION USE DIRECTIONS
FOR USE AND DISTRIBUTION ONLY WITHIN THE STATE OF NEW YORK
TO CONTROL THRIPS IN DRY BULB ONIONS

Carzol SP
INSECTICIDE

EFFECTIVE DATE: July 24, 2006
EXPIRATION DATE: September 15, 2006

ACTIVE INGREDIENT:	Formetanate hydrochloride (N, N-dimethyl-N'-(3-[[[methylamino]carbonyloxy]phenyl]methanimidamide monohydrochloride).....	% BY WT.
OTHER INGREDIENT:	8.0%
		TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER – POISON
PELIGRO – VENENO



DIRECTIONS FOR USE

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- Follow all applicable directions, restrictions, Worker Protection Standard (WPS) requirements and precautions on EPA-registered label for Carzol SP, EPA Reg. No. 10163-265.
- This label must be in the possession of the user at the time of pesticide application.

CROP	PEST	APPLICATION
DRY BULB ONIONS	Thrips	<p>One application –</p> <p>1) Do not exceed 1.25 lbs formulated product per acre.</p> <p>OR</p> <p>Two applications –</p> <p>1) Make two applications at 0.75 lbs formulated product per acre per application. Do not exceed 1.5 lbs formulated product per acre per season. Applications should be made no less than seven days apart.</p>
<ul style="list-style-type: none"> • Aerial mixer/loaders must not mix/load more than 217 lbs of formulated product (equivalent to 87 water soluble bags) per person per day. • Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. • Do not apply within 30 days of harvest. • Do not make more than 2 applications per acre per growing season. • Do not allow spray to drift onto adjacent crops. • Do not spray while bees are visiting the treatment area. • Crop residues are not to be fed to livestock. • The New York State Department of Environmental Conservation must be immediately informed of any adverse effects which may result from the use of this product. • Observe the following plant back intervals after harvest: <ol style="list-style-type: none"> 1. No restrictions for Alfalfa. 2. 30 days for leafy vegetables 3. 120 days for root crops 4. 12 months for small grains and all other crops 		

Gowan Company
P.O. BOX 5569
Yuma, AZ 85366-5569

Section 18: NY Onions 2006

ACCEPTED

JUL 20 2006

NEW YORK STATE DEPARTMENT
OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS
PESTICIDE PRODUCT REGISTRATION