

## Endosulfan Guidance for EPA Comments

December 2007

- List the insects controlled for each crop and provide information on alternatives with a focus on the following information:
  - Are alternatives available? If so, what are they?
  - Do alternatives control the same range of pests as endosulfan?
  - Do alternatives cost more to control the same range of pests? If so, how much more?
  - Is it necessary to apply the alternatives more frequently to achieve the same level of control as endosulfan?
  - Are two or more alternatives necessary to control the same range of pests as endosulfan? If so, what are the alternatives?
- Since EPA's primary concern with endosulfan is related to worker exposure, please provide information on how endosulfan is typically used by workers and handlers.
  - How is endosulfan typically applied? By airblast sprayer, aerially, groundboom or other method? Soil or foliar application?
  - Would the same person both mix and load, and apply endosulfan or are those jobs separate? How many acres might one person treat in the course of a day, week or season?
  - Is endosulfan typically applied by a custom applicator, hired worker or owner operator?
  - What cultural practices are typically used by growers following endosulfan applications? Would these practices include continuous contact with plant foliage or is contact an infrequent occurrence? Do workers normally enter treated areas immediately following applications?
  - What is the typical application rate and number of applications annually?
  - Are engineering controls such as a closed tractor cab or closed mixing/loading systems typical for your crop?
  - List ways worker risk might be mitigated. Could reentry intervals be lengthened? Could daily limits be placed on the number of acres a single applicator can treat? Can growers live with a closed cab requirement?
- Focus on the benefits of endosulfan use for your crop.
- Are there any export issues associated with endosulfan? Is endosulfan use necessary to control an insect pest in order to meet the phytosanitary requirements of a critical trading partner? If so, what is the economic impact if you were to lose that export market?
- Provide other information that you think is important to address both the benefits and occupational risks associated with endosulfan use.
- Send your comments to EPA.

If you're submitting your comments electronically, go to the Federal eRulemaking Portal at:

<http://www.regulations.gov>.

Follow the on-line instructions for submitting comments.

Don't forget to include the Docket ID of: EPA-HQ-OPP-2002-0262

If you're submitting by mail, send comments here:

Office of Pesticide Programs  
(OPP) Regulatory Public Docket (7502P)  
Docket ID Number: EPA-HQ-OPP-2002-0262  
Environmental Protection Agency,  
1200 Pennsylvania Ave., NW.,  
Washington, DC 20460-0001

- Also provide an electronic copy of your comments to Scott Rawlins at [scottr@manainc.com](mailto:scottr@manainc.com).