



August 8, 2000

Public Information and Records Integrity Branch (PIRIB)
Information Resources and Services Division (7502C)
Office of Pesticide Programs (OPP)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Re: Docket Control Number OPP-00666 (Production Caps)

Dear Sir:

The American Association of Pesticide Safety Educators (AAPSE) offers the following comments regarding the Environmental Protection Agency's request for a mechanism to allocate production caps among producers as a means of reducing risk from pesticide exposure. Our members include Cooperative Extension pesticide education program coordinators from nearly all of the land-grant universities in the U.S.; and pesticide certification managers from state, tribal, commonwealth, and federal agencies. Our goal is to enhance public health and the environment through involvement in education, outreach, and research which directly benefits pest managers, policy makers, and the public.

Pesticide risk reduction can be directly linked to the skills, attitude and professionalism of the applicator. An excellent example of this can be found in Dow AgroSciences' pesticide risk reduction program for users of Vikane® (sulfuryl fluoride), a structural fumigant. Pest control operators who use Vikane® are required to complete an extensive (usually two day) training course before they can purchase Vikane®. Dealers agree to verify that applicators have completed stewardship training. Dow AgroSciences routinely checks dealers' sales records against their list of applicators who have completed training. Dow AgroSciences has an agreement with dealers that allows them to invoke a "stop sale" clause for PCOs who fail to meet stewardship requirements. Dow AgroSciences also conducts Quality Assurance reviews with their own inspectors to make sure applicators adhere to the stewardship program.

Dow AgroSciences' Vikane® stewardship program is not mandated in law, but works because there is cooperation between dealers, state lead agencies and applicators. It is a win-win-win situation. Users have access to a product essential to their business, Dow AgroSciences is assured that users understand risk mitigation, and regulatory agencies are assured that the public is properly protected from misuse.

Since product safety training is the first step in risk mitigation, AAPSE recommends that production caps be linked to stewardship programs. In both the short and long term, training can be more effective than just limiting the amount of product that can be used. EPA can reduce the potential hazard, the manufacturers can sell more product, and growers will have access to a product they are properly trained to use.

We look forward to your consideration of this suggestion for negotiating production caps for products containing azinphos-methyl or similar active ingredients.

Sincerely,

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