



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE

PO Box 42560 • Olympia, Washington 98504-2560 • <http://agr.wa.gov> • (360) 902-1800

January 5, 2010

Anthony Britten, Team Leader – 7505P
U.S. Environmental Protection Agency EMEX
One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

RE: Recertification of Section 18 emergency exemption for use of spirotetramat (Movento) to control onion thrips infesting dry bulb onions in Washington

Dear Mr. Britten,

The Washington State Department of Agriculture (WSDA) requests a specific exemption under the provisions of Section 18 of FIFRA for use of spirotetramat (Movento, EPA Reg. No. 264-1050, manufacturer by Bayer CropScience) to control onion thrips in dry bulb onions in Washington, and incorporates by reference all information submitted in the previous application dated July 6, 2009.

This is the 2nd year that this use has been requested.

Also in accordance with the regulations, WSDA and the Pacific Northwest Vegetable Association (PNVA) certify the following:

1. The emergency condition(s) described in the previously submitted emergency exemption application continues to exist.
2. All information submitted in the previously submitted emergency exemption application is still accurate.
3. The proposed conditions of use are identical to the conditions of use EPA approved previously for emergency File Symbol #09-WA-05 (dated: July 22, 2009), except as expressly identified below:
 - The use period requested by industry is **May 15, 2010 through September 15, 2010.**
4. We are not aware of any alternative chemical or nonchemical practice that may offer a meaningful level of pest control.
5. The following concludes our Emergency Use Report for spirotetramat (EPA File Symbol: 09-WA-05) applied to control onion thrips in dry bulb onions in Washington during 2009.
 - Total number of acres treated once in Washington under this emergency exemption: 3,264 treated acres.

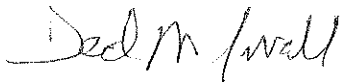


- Total amount of pesticide applied in Washington under this emergency exemption: 127.5 gallons.
- To the best of our knowledge, no negative impacts to the environment or human health resulted from this use.

If you have any questions, please contact this office at (360) 902-2030 or Steve L. Foss at (360) 902-2049 or e-mail sfoss@agr.wa.gov.

Sincerely,

PESTICIDE MANAGEMENT DIVISION



Ted Maxwell, Program Manager, Registration Services

SLF:jh

cc: Jud Hedine, PNVA	Doug Walsh, WSU
Timothy D. Waters, WSU	Linda Aschbrenner, Bayer CropScience
CharLee Parker, WSU	George Robinson, ODA
David Priebe, ODA	Wayne Clifford, WDOH
Cheryl Niemi, WDOE	Paul Dahmer, WDFW
Jay Davis, USFWS	Chad Schulze, EPA
Marco Gaske, Yakama Nation	Alan Schreiber, WSCP
Cliff Weed, WSDA	Royal Schoen, WSDA

Attachments

1. Draft Section 18 label for use of Movento (EPA Reg. No. 264-1050)
2. Letter of support from Linda Aschbrenner, Bayer CropScience (dated December 16, 2009).



Bayer CropScience

Bayer CropScience LP
 P.O. Box 12014, 2 T.W. Alexander Drive
 Research Triangle Park, North Carolina 27709
 1-866-99BAYER (1-866-992-2937)

MOVENTO™

For Use On Dry Bulb Onions For Management of Onion Thrips

SECTION 18 EMERGENCY EXEMPTION

File Symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN THE STATE OF WASHINGTON UNDER SECTION 18 EMERGENCY EXEMPTION

These use directions must be in possession of the user at the time of pesticide application. It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire Directions for Use and Disclaimer of Warranties before using this product. Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the registered product label for MOVENTO™ (Registration Number 264-1050). Any adverse effects resulting from the use of MOVENTO™ under this specific exemption must be immediately reported to the Washington State Department of Agriculture.

EFFECTIVE PERIOD:

This specific exemption becomes effective xxxxx and expires on xxxxx.
 A maximum of 20,000 acres of dry bulb onions may be treated in Washington State.

DIRECTIONS FOR USE

CROP	PEST	Rate of MOVENTO™ fluid ounces/Acre
Onion (bulb)	Onion thrips	5.0

Restrictions/Precautions/Use Instructions:

Pre-Harvest Interval (PHI): **7 days**
 Minimum interval between applications: **7 days**
 Maximum MOVENTO allowed per crop season: **10 fluid ounces/Acre (0.16 lb ai/A)**
 Do not apply more than two (2) applications per acre per year.
 Onions must be harvested prior to bloom.
 To minimize drift to adjacent fields, use ground application whenever possible.
 To the extent possible, local beekeepers should be notified prior to applying this chemical.
 Adhere to the existing bee precautions on the Section 3 label.
 Apply specified dosage of MOVENTO as needed for control. Treatment must be made when thrips populations begin to build and before a damaging population becomes established. Best results will be obtained when two applications are made on a 7-10 day interval, incorporated into a seasonal program where effective products with different modes of action are utilized in rotational sequences for management of thrips populations. **MOVENTO must be tank-mixed with a spray adjuvant having spreading and penetrating properties to maximize leaf uptake and systemicity of the active ingredient within treated plants; please contact your local Bayer CropScience representative or PCA for specific recommendations.**

For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577

For **PRODUCT USE** Information Call 1-866-99BAYER (1-866-992-2937)

or

Visit our worldwide web site at www.bayercropscienceus.com

As with any crop-protection product, always read and follow label directions.
 For additional information call toll-free 1-866-99BAYER (1-866-992-2937).

Bayer CropScience



Mr. Steve Foss
Washington State Department of Agriculture
Pesticide Management Division
1111 Washington Street, 2nd Floor
P.O. Box 42591
Olympia, WA 98504-2591

December 16, 2009

Bayer CropScience
RTP
P. O. Box 12014
RTP, NC 27709
Tel. 919 549-2000

RE: Movento™
Repeat Section 18 Emergency Exemption Request for 2010
For Use on Dry Bulb Onion to Control Onion Thrips (*Thrips tabaci*)

Dear Mr. Foss;

It is our understanding Washington State Department of Agriculture, on behalf of onion growers in your state, will petition EPA for a repeat Section 18 Emergency Exemption for the use of Movento™ (active ingredient spirotetramat) on dry bulb onions to manage onion thrips. This letter is to inform you of our continued support of this Section 18 request, and to confirm that sufficient quantities of Movento are available to provide to the onion growers in your state.

IR-4 is currently conducting trials on onion thrips, and is expected to complete residue trials at the end of 2009. Upon completion of IR-4 data reports, Bayer will submit a petition to EPA to add this use to the Section 3 label.

A draft Section 18 label is enclosed with use directions, restrictions and requirements. If you need additional information or have any questions, please contact me at (919) 549-2255 or linda.aschbrenner@bayercropscience.com.

Sincerely,

Bayer CropScience LP

A handwritten signature in cursive script, appearing to read "Linda Aschbrenner".

Linda Aschbrenner
State Registration Manager

Cc: Larry Hodges, Federal Registration Manager
Kevin Adam, Product Manager