



Department of Pesticide Regulation



Brian R. Leahy
Director

Edmund G. Brown Jr.
Governor

January 9, 2017

TO: County Agricultural Commissioners of Butte, Del Norte, Fresno, Imperial, Kern, Kings, Madera, Merced, Monterey, Riverside, San Joaquin, San Luis Obispo, Santa Barbara, Santa Cruz, Solano, Stanislaus, Tulare, Ventura, Yuba Counties

SUBJECT: OVERSIGHT OF USE LIMITS FOR 1,3-DICHLOROPROPENE

Beginning January 1, 2017, the use of 1,3-dichloropropene (1,3-D; Telone) is limited to no more than 136,000 adjusted pounds¹ in each township for each year. Additionally, 1,3-D applications during December are prohibited. These requirements are included in the recommended permit conditions you recently received, as well as in a memorandum of understanding (MOU) between the Department of Pesticide Regulation (DPR) and Dow AgroSciences (DAS). The MOU also includes an enforcement section and requires DAS to report certain data to DPR (see attached).

Under the MOU, DAS and its contractor, Agrian, Inc., will continue to administer the use limits using the same process as the previous township cap program. However, DPR requests that county agricultural commissioners (CACs) provide greater oversight for townships that historically have had high 1,3-D use, specifically those townships that exceed 102,000 adjusted pounds (75 percent of the 136,000-adjusted pound limit) or have depleted banks. As shown in the attached list, your counties include one or more townships that exceeded this amount for 2015. For these townships, DPR requests that CACs independently track 1,3-D use and compare the amount to the amount calculated by Agrian, Inc., as documented on the notices of intent. If a discrepancy is found between the information on the notice of intent and your tracking data, please notify Mr. Randy Segawa at 916-324-4137 or <Randy.Segawa@cdpr.ca.gov>; or you may notify Ms. Pamela Wofford at 916-324-4297 or <Pam.Wofford@cdpr.ca.gov>. To assist CACs with the independent tracking, DPR has developed an Excel spreadsheet that is being e-mailed to your deputy CAC.

¹ 1,3-D use limits are "adjusted pounds" using Application Factors that vary from 0.3x to 2.3x of pounds applied depending on fumigation method, month, and region. The Application Factors account for differences in emissions and air concentrations associated with different application methods, field conditions, and weather conditions.



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If you have any questions, please contact Mr. Segawa or Ms. Wofford. Thank you for your assistance.

Sincerely,



Teresa Marks
Chief Deputy Director
916-445-4300

Attachment

cc: Mr. Tony Linegar, Pesticide Regulatory Affairs Committee Chair (w/Attachment)
California Agricultural Commissioners and Sealers Association

Ms. Marylou Verder-Carlos, DPR Assistant Director (w/Attachment)
Ms. Donna Marciano, DPR Branch Chief (w/Attachment)
Mr. Randy Segawa, DPR Special Advisor (w/Attachment)
Ms. Pamela Wofford, DPR Environmental Program Manager I (w/Attachment)
Mr. Joe Marade, DPR County/State Liaison (w/Attachment)

Townships with depleted banks or that exceeded 102,000 adjusted pounds (75 percent of updated use limit) in 2015.

County	Township	Comments
Butte	17N 3E	
Del Norte	18N 1W	
Fresno	13S 17E	Part in Madera
	13S 18E	
	14S 17E	
	14S 18E	
	14S 19E	
	14S 21E	
	15S 18E	
	15S 19E	
	15S 21E	
	15S 22E	
	15S 23E	
	15S 24E	
	16S 19E	
	16S 20E	
	16S 21E	
	16S 22E	Part in Tulare
	16S 23E	
	17S 20E	Part in Kings
	17S 22E	Part in Kings
Imperial	16S 16E	
Kern	11N 19W	
	11N 22W	
	25S 26E	
	26S 24E	
	26S 26E	
	28S 26E	
	31S 27E	
	31S 30E	
	32S 28E	
	32S 29E	
Kings	17S 20E	Part in Fresno
	17S 22E	Part in Fresno
	18S 21E	
Madera	11S 17E	
	12S 17E	
	12S 18E	
	13S 17E	Part in Fresno

County	Township	Comments
Merced	4S 10E	Part in Stanislaus
	5S 10E	Part in Stanislaus
	6S 10E	Part in Stanislaus
	6S 11E	Depleted bank
	6S 12E	Depleted bank
	6S 13E	
	7S 10E	
	7S 11E	Depleted bank
	7S 12E	Depleted bank
	9S 11E	
Monterey	12S 1E	Part in Santa Cruz
	12S 2E	Part in Santa Cruz
	14S 3E	Depleted bank
Riverside	6S 8E	
San Joaquin	2S 8E	Part in Stanislaus
	2S 9E	Part in Stanislaus
	3S 6E	
	4N 6E	
San Luis Obispo	11N 35W	
Santa Barbara	10N 34W	Depleted bank
Santa Cruz	11S 2W	
	12S 1E	Part in Monterey
	12S 2E	Part in Monterey
Solano	7N 2E	
Stanislaus	2S 8E	Part in San Joaquin
	2S 9E	Part in San Joaquin
	4S 10E	Part in Merced
	5S 10E	Part in Merced
	6S 10E	Part in Merced
	6S 8E	
Tulare	16S 22E	Part in Fresno
	16S 23E	
	17S 23E	
	21S 26E	
	23S 26E	
	24S 25E	
	24S 26E	
Ventura	1N 21W	Depleted bank
	2N 21W	Depleted bank
	2N 22W	Depleted bank
Yuba	15N 4E	
	17N 3E	