



# Department of Pesticide Regulation



Brian R. Leahy  
Director

## MEMORANDUM

Edmund G. Brown Jr.  
Governor

TO: Marylou N. Verder-Carlos, D.V.M., M.P.V.M.  
Assistant Director  
Department of Pesticide Regulation

FROM: Brian Leahy  
Director  
916-445-4000

DATE: February 19, 2014

SUBJECT: SUSPENSION OF EXCEPTIONS TO TOWNSHIP LIMITATIONS ON USE OF  
1, 3-DICHLOROPROPENE (1, 3-D)

I received your memorandum dated February 14, 2014, regarding your recommendation to suspend approvals of exceptions to the township use limits set forth in the 2002 California Management Plan for 1, 3-D.

Based upon your memorandum, the Department of Pesticide Regulation (DPR) will not approve any requests to exceed the limitations on use set forth in the 2002 California Management Plan for 1, 3-D, until further notice. In general terms, this means that 1, 3-D use above 90,250 pounds<sup>1</sup> in townships that have consistently exceeded that amount since 2002 will not be allowed and in no instance will use be allowed in any township over 180,500 pounds<sup>2</sup>. For the year 2014, this will primarily affect a limited number of townships who grow sweet potatoes, strawberries, nut trees, carrots, and grapes.

In the meantime, I expect that the comprehensive risk assessment of 1, 3-D currently in progress will be finalized in about 18 months. Additionally, I expect that the final evaluation of the monitoring data and the computer model used to predict air concentrations will be complete at approximately the same time. Information from this work will help inform DPR's determination as to whether further mitigation measures are needed.

<sup>1</sup> This represents adjusted total pounds, or ATP, that is calculated by adjusting the actual pounds of fumigant used by an application factor derived from the application method, month, and region of use that indicates the relative amount of 1, 3-D that is potentially present in the air.

<sup>2</sup> The only exception DPR should consider approving is use associated with alternatives research, quarantine, or other special applications that result in total township use above the pound limits set in the 2002 California Management Plan.

