

To: Gary Obenhauf

From: Mike Hurley
DFA of California
1855 S. Van Ness Ave.
Fresno, California 93721

Re: Sulfuryl Fluoride Fumigation Project Update

January 3, 2002

DFA has been working with Dow Agri-Chemical for a number of years to find a replacement for the eminent loss of Methyl Bromide. Numerous commodity boards supported the residue study beginning in 1999, and it was completed in 2001. The Sulfuryl Fluoride residue project took a number of years to complete because of its enormity.

DFA completed efficacy studies as well confirming SF is effective against Indian Meal Moth, Warehouse Beetle, Navel Orange Worm, Dried Fruit Beetle, Red Flour Beetle, Confused Flour Beetle, Codling Moth, Sawtooth Grain Beetle, and Merchant Grain Beetle. SF is effective against all of these insects, all stages. The insect eggs are the most difficult to kill and require higher doses than the active life stages.

The two US EPA approved Phases of the residue study evaluated a multitude of variables including: various commodities, dose, vacuum, multiple fumigations, off-gassing, and sampling location and others. The study was conducted under Good Laboratory Procedures (GLP). Both Sulfuryl Fluoride and Fluoride residues were analyzed for the study. An Experimental Use Permit (EUP) for walnuts and raisins has been presented in the Federal Register and promulgation is expected this month. A full label for Sulfuryl Fluoride use for all dried fruit and tree nuts is anticipated this year. As you know, the US EPA does not move quickly.

If you have any questions, don't hesitate calling me at (559) 233-0604 ext.109.

Sincerely,

J. Michael Hurley
DFA Laboratory Director