

Comments on
EPA-HQ-OPP-2007-0588
RED: EPA-HQ-OPP-2007-0108

The following comments are provided by Pathfinder Irrigation District and are submitted by Dennis Strauch, General Manager.

Comments are made on the proposed amended labeling language.

1. Label Change- (Description) Application Restrictions: Certified Applicator Requirements. Proposed Language-“At least two certified applicators must be at the application site and able to maintain visual contact with all certified applicators participating in the application.”
 - 1) **Comment- All of the District’s applicators are licensed through the State of Nebraska to apply Magnacide H (acrolein) and participate annually in the training provided by Baker Petrolite. Currently we have two licensed applications on site to setup for an application and teardown at the end of and application. One applicator is present during the application, which can last 4-6 hours. To have two applicators present for that time period would hinder the District’s ability to complete its other work duties and result in unnecessary costs to the District.**
2. Label Change (Description) Application Restrictions. “Maximum number of applications: 8 application per year.”
 - 2) **Comment- Pathfinder Irrigation District utilizes a maintenance program for the treatment of pondweed with Magnacide H. By making treatments more often with lower rates the District is able to better control the pondweed with the use of less product overall.**