Site	Extent of Usage				
	Lbs Active Ingre- dient/Year (Per- cent of Total Dichlorvos Use)**	Percent of Site Treated	Pests	Major Alter- natives	Economic Im- pact Extent and Significance
Other transpor- tation vehi- cles includ- ing trucks, shipholds, and railroad cars			angoumois grain moth ants cadelle cheese mite cigarette beetle confused flour beetle dermestids drugstore beetle flat grain beetle granary weevil Indian meal moth lesser grain borer mealworms Mediterranean flour moth red flour beetle rice weevil sawtoothed grain beetle	pyrethrins	Not expected to be significant
Total usage ac- counted for above	250,000-500,000 (52-90%)				

TABLE 3.—SUMMARY OF DICHLORVOS BENEFITS BY SITE—Continued

**Note: The total used in calculating percentage of dichlorvos use for a given site is based on the mid point (375,000) of the total range 250,000 - 500,000.

G. Analysis of Comments

Comment. The Southeastern Peanut Association (SPA) commented that the substitutes to dichlorvos are substantially less effective on peanuts and not fully available for commercial use.

Agency response. The Agency cannot fully respond to this comment as the substitutes for dichlorvos were not identified in the letter from the SPA. The Agency has identified the pyrethrins as a possible alternative to dichlorvos. Because the pyrethrins are registered for use in much the same way as dichlorvos and due to the lack of comparative efficacy or resistance data, EPA assumes that they would provide acceptable levels of insect control. Regarding the availability of the pyrethrins, because the growing conditions that affect chrysanthemums (the source from which pyrethrins are derived) can vary from year-to-year, the

Agency recognizes that the availability and price of pyrethrins will fluctuate as well.

Comment. The California Department of Food and Agriculture (CDFA) commented that dried fruit and tree nuts can be kept insect free if fumigated before entering storage and once in storage, receive regular treatments of dichlorvos. CDFA states that alternate methods of insect control, irradiation and controlled atmospheres are not feasible.

Agency response. The Agency believes that the pyrethrins would serve to control insects in the above situation if used in the same manner as dichlorvos. EPA does not have data that indicate the number of treatments needed for the pyrethrins to replace dichlorvos and still provide the same level of control. The Agency also believes that as the fumigant methyl bromide is phased out under the Clean Air Act, alternative measures such as irradiation, heat, cold, and controlled atmospheres will become more important. *Comment.* The American Corn Millers Federation (ACMF) commented that the use of pyrethrins or resmethrin as alternatives to dichlorvos are not as efficacious in storage areas, warehouses, or processing areas of plants.

Agency response. The Agency has identified the pyrethrins and resmethrin (aerosol treatments) as potential alternatives to fogging with dichlorvos in commercial, industrial, and institutional areas. The ACMF did not submit data to support their contentions of inadequate efficacy of the alternatives. In the absence of comparative efficacy and/or resistance data, EPA assumes that these registered alternatives would provide adequate levels of insect control.

Comment. Two representatives from the popcorn industry commented that there are no replacements for the use of dichlorvos pest strips in popcorn storage facilities.

Agency response. The Agency has no specific information regarding insect control in stored popcorn; however, EPA does have information regarding