



TEXAS DEPARTMENT OF AGRICULTURE
COMMISSIONER SID MILLER

August 8, 2018

Anne Idsal
Administrator, U.S. Environmental Protection Agency
Region 6
Dallas, TX

Dear Ms. Idsal,

I am again reaching out to you to present alternative solutions to the current treatment of Fever Ticks in Texas. It was unfortunate that you decided not to attend the meeting scheduled yesterday at the Texas Department of Agriculture to discuss options to the matter at hand.

However, I have met with the industry and discussed the different options available. One is short-term and the others are long-term. I would also look forward to any other suggestions you might have.

The short-term solution would be to continue to allow the use of the spray box for the next 45 days, and propose an acceptable permanent solution during the 45 days. This would include giving the producer the option to not have young calves, older, or convalescent cattle sprayed in the spray box. The owner would need to supply the labor to separate the cattle not going through the spray box.

A short-term and long-term solution is to allow the cattle to run through the spray box, but catch the animal's head outside the spray box prior to treatment, and manually spray the head. This treatment would be in accordance with the product label.

Another option is to develop a new spray box that meets the ventilation requirements under the pesticide label.

All solutions require that USDA-APHIS provide that the Memorandum of Understanding between them and the Texas Animal Health Commission (TAHC) permit TAHC personnel to be supervised as pesticide applicators under the USDA-APHIS applicator license.

I would like to implement these changes immediately upon your agreement.

If you have any questions do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Sid Miller", written over a horizontal line.

Sid Miller
Commissioner