Appendix B

NPDES Applicator and Application Estimates

The following table provides EPA’s current estimates of the number of applicators and applications of pesticides that fall within pesticide use patterns that result in the application of pesticides to and over, including near, waters of the United States. The information has not undergone peer review, and EPA intends to update these estimates as additional data become available.

There are two main limitations to the data provided. First, there is not a direct source of information on the number of applicators and applications made for these pesticide use patterns. As a result, the estimates were derived from secondary sources of information, and generalizing assumptions were sometimes made. The second limitation is that the definition of an application and an applicator is derived from the best available data by use pattern. Therefore the definition may be different by use pattern. More detail, by pesticide use pattern, is provided in the calculation notes.

Following the table is a listing of information sources used in EPA’s estimation of the number of pesticide applicators and applications. Information sources are listed by pesticide use pattern.

**NPDES Applicator & Application Estimates**

| **Use Patterns** | **Number of Applicators** | **Number of Applications** | **Calculation Notes** |
| --- | --- | --- | --- |
| Mosquito Adulticides | 1,200 | 461,450 | There are 400 mosquito abatement districts and approximately 800 other public agencies that apply mosquito control pesticides--it is assumed that each represents an applicator. There were 103 million acre-treatments with insecticides in 2005 (99 million for adulticides and 4 million for larvicides). Assuming that 77% of adulticide applications are made by ground and 23% are made by air and that an average adulticide application by ground covers 180 acres and that an adulticide application by air covers 600 acres, there are an estimated 461,450 annual adulticide applications. |
| Mosquito Larvicides | 1,200 | 18,800 | There are 400 mosquito abatement districts and approximately 800 other public agencies that apply mosquito control pesticides--it is assumed that each represents an applicator. There were 103 million acre-treatments with insecticides in 2005 (99 million for adulticides and 4 million for larvicides). Assuming that 77% of larvicide applications are made by ground and 23% are made by air and that an average larvicide application by ground covers 180 acres and that a larvicide application by air covers 600 acres, there are an estimated 18,800 annual larvicide applications. |
| Aquatic Weed Control - Lakes and Ponds | 23,200 | 4,524,000 | OPP data show approximately 23,200 applicators holding certification in the aquatic category. The estimate of applications to lakes, ponds, irrigation systems and waterways is the result of 23,200 multiplied by 1 application per day over 195 work days (5 work days per week multiplied by 39 weeks [9 months of the year]), which equals 4,524,000 applications per year. EPA cannot determine what applications are made to each site, so one overall number has been calculated for all aquatic weed control in lakes, ponds, irrigation systems, and waterways. |
| Aquatic Weed Control - Irrigation Systems and Waterways | See Aquatic Weed Control - Lakes and Ponds | See Aquatic Weed Control - Lakes and Ponds | See Aquatic Weed Control - Lakes and Ponds |
| Aquatic Weed Control – Ditchbanks | 330,000 | 660,000 | About 15%, or 330,000, of 2.2 million U.S. farms are irrigated. EPA assumes that each farm is treated twice per year. This does not account for types of irrigation. |
| Aquatic Nuisance Animal Control | Not Available | Not Available | Includes use of pesticides for the control of fish, lampreys, and mollusks. EPA currently does not have an estimate of the number of applicators and applications within this use pattern. |
| Wide Area Pest Control - Insects | 170 | 5,000 | Based on grasshopper & Mormon cricket control. Estimate of 5 million acres treated with a minimum of 1,000 acres per application. This is a low estimate because it does not include east of the Mississippi, and parts of west. Number of applicators is based on NAAA survey estimate of available aircraft. |
| Wide Area Pest Control - Invasive Weeds | 5,000 | 10,000 | Herbicides are usually not feasible for control of large wide area infestations. They are most likely used to control and/or eradicate smaller newer infestations. Applicators may be individual landowners or government agencies. No data is available for number of applicators and applications, but EPA estimates that there are at least 5,000 applicators and 10,000 applications, and that these estimates may be low. |
| Forestry | 4,500 | 4,500 | There are 5,175 tracts of forest in the U.S. and 2.7 million acres of forest are treated per year. Assuming that an average pesticide application to forests is 600 acres (based on NAAA survey), the number of applications is calculated as the number of acres treated per year divided by the number of acres treated per application. It is assumed that the 4,500 applications are evenly distributed across the 5,175 forest tracts, thus it is assumed that there is one applicator per treated tract. The estimate of the number of applications and applicators may be low because data are not available on pesticides applied by ground. |
| Total | 365,270 | 5,683,750 |  |

**NPDES Applicator &Application Information Sources**

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