## Region 4 Pre- SFIREG Meeting Notes April 18-19, 2017

# **April 17<sup>th</sup> (States-Only Meeting):**

Chair Pat Jones called the meeting to order at 8:01 am.

States had introductions. Present were SC (8), TN (2), GA (2), NC (4), FL(4), KY(3), MS(3), AL(2). All states in Region 4 were represented. Kelly Friend called in from Florida.

**Region 4 Polling Place** (electronic voting devices were used): Several questions were asked using Turning Point audience response clickers.

2 related to "proper category" for sales and use for RUP's; 1 related to enforcement of bee-related statements; 1 related to the number of bee kill cases encountered in the past two years; 1 related to the expectation of auxin-related cases in 2018; Do you normally find fipronil in dead bees?; Do you normally find deet in dead bees?; Under WPS in the state will you take enforcement action against applicators that do not wear correct respirators?; Does our state require you to maintain an accurate and detailed report of in-kind hours?; Is closed cell foam or rigid foam board a construction issue in your state for termite control?

Charlie surveyed other states regarding registration of several products. He asked if other states had an existing organo-auxin rule. Pat stated that Arkansas just updated their auxin rule. Of states in the room, only Mississippi had related legislation. We also discussed auxin herbicide label statements related to threatened and endangered species (Charlie and Pat).

Charlie Clark asked if any other states had pending legislation for Cannibis (medical M. or hemp).

FL-yes for medical, no for hemp;

KY-yes for hemp, not sure about medical;

MS-yes for medical at University of MS, no for hemp.

AL-yes for oil, looking into hemp;

NC-industrial hemp law passed and commission set up to govern limited growing of industrial hemp. No medical marijuana approved yet but bill has been introduced to allow it.

SC- existing industrial hemp law but enforcement not assigned to any agency. Medical marijuana bill is looking favorable in SC, but not passed yet.

TN – yes for Hemp, no for medical marijuana;

GA – no industrial hemp, yes for ? oil.

Kaput Issue: Charlie Clark reviewed the discussions that took place at POM last week. Meredith Laws and Mark Suarez presented additional information about the EPA decision to register this product. The discussion tomorrow will be more thorough related to this. Florida denied an EUP in their state because of questions related to the process of baiting.

Tony Cofer: States that register this product may have to make it restricted use within the state. The decision-making process for this product was inconsistent. The label requirements are almost impossible to follow (dead hog recovery and disposal, etc.). Concerned over the lack of discussion EPA had with the states before this decision to register was made.

Charlie Clark: The leadership at the EPA in the registration division is fairly new, and these people are not as familiar with states-EPA interaction on these types of issues. It should be the responsibility of AAPCO to meet with the new EPA staff and begin the process of interaction with this group.

WPS issues (Pat): Are there major issues now in the states with implementation? SC...no outreach being done by extension at this time, so how is the information getting out to growers?

C&T issues: Pat - No flexibility in the definitions (Public Health as an example).

Kelly Friend (FL) brought up a problem with CPARD. They entered data and all data were lost. Florida is very dissatisfied with the non-functionality of CPARD. She wants this brought to the attention of the EPA. Most states in the region have not tried to enter data at this point because we were notified that the system is not useable yet.

General Meeting with States and EPA: Pat Jones called the meeting to order at 10:00 am. (16 EPA staff from Region 4 joined the meeting). Went around the room for introductions, and Pat Jones and Mike Weyman welcomed folks to Clemson.

Beverly Bannister: Introduced Caroline Freeman, who will be replacing Jeaneanne Gettle in Region 4. Connie Roberts (Regional Ag. Coordinator was introduced). She thanked Clemson for hosting the meeting. EPA is going through a transition, so there is limited information related to the budget at this time. She pledged to stay constant to the mission of the EPA in working with the states in the region. EPA now is operating on a continuing resolution, and cannot discuss the FY 18 budget. Pat Jones mentioned an email that was sent out regarding the cuts to the EPA agencies (OECA, OPP, etc.). We do not know the full effect of these cuts in Region 4 yet. (States discussions later in meeting)

**C&T - WPS:** A presentation on WPS and C&T implementation and updates was given by Richard Pont via conference call.

**WPS Rule**: On Jan 22 2017, the WPS rule went into effect. The implementation timeline was reviewed. There was a petition to delay implementation to January 2018. It was denied and then another petition was submitted by NASDA. This is now under consideration. A decision will be forthcoming related to this petition.

- -How to comply manuals will be printed when resources to do this are secured.
- -Richard reviewed the PERC projects.
- -Train the Trainer Implementation was discussed
- -Pesticide Safety Training materials EPA has an approval process in place for pesticide safety training. It is on EPA website.

- -Other ongoing WPS activities were reviewed.
- -Federal Register notice is being considered to deal with technical corrections (later this year)
- -Respirator requirements new draft language (options for equivalent or higher level of protection).
- -Discussed AEZ implementation and interpretive guidance issues (suspend application, shelter in place, do not contact, chemigation, etc.).
- -List of pesticide products requiring respirator, eyewash, double notification, etc.

Richard reviewed some components of the Office of Inspector General (OIG) WPS audit.

Pat Jones asked a question about AEZ and droplet size in greenhouses related to droplets that are electrostatically charged and more likely to not drift off the target plants. When will respirator materials be available on the website? Richard responded...probably in May of this year.

**C&T:** Richard Pont gave an overview of the Rule. Had not been revised since 1974. Final revised rule published in January, 2017, with effective date being March 2017. Now, it has been extended to May 22, 2017. So far, there has been no news on a further delay.

Key revisions in the new Rule were reviewed.

Implementation timeline: The new C&T Rule will go into effect in May of 2017(if no further delay). There will be a full 3 years for states to submit a revised C&T plan (2020). EPA will approve final state plans by 2022. Plan approvals will simply be a formality because Regional EPA and states will already have discussed and developed the plans to be in concert with requirements. The approval process will be governed by a Delegation of Authority (FIFRA Delegation 5-2). CPARD 3.0 will be used to submit the plan (Revised CPARD). Regions and states should work together before submission in CPARD to resolve any issues. A national workgroup process will be in place to deal with questions of equivalency, etc. Regions will get concurrence from HQ through this process. The region will approve state plans and send an approval letter. Tribal plans will undergo the same process as state plans. EPA workgroup composed of OPP, OECA, and OGC will coordinate the approval process. HQ will coordinate the effort and ensure consistency among regions. Regional offices will work with the SLAs within their region to formulate plans. OPP will work with tribes (national instead of regional level). Outreach efforts are being made. A C&T PREP was held in April 2017. This also will be covered at AAPSE June, 2017, AAPSE regional meeting in July 2017, Regional/State meetings, EPA Biennial PACT meeting in 2018.

Communication is ongoing among EPA HQ, Regions, States, and Tribes. Tools developed by EPA will be: a Checklist of what should be in the state plans, CPARD 3.0, initial assessment process, repository of relevant documents, Q&A that will be updated regularly, One page issue resource sheets, establish the role of workgroup and approval process.

Data entry problems with CPARD entry. (question from Florida) ...Encountering problems in copying in data from states (code problems). Richard said the entered data have not been lost, but should still be in the system somewhere.

Randy Dominy (WPS question) When will WPS outreach materials be printed? Richard responded that it is essential to print at least 500 copies for each state, but it has not been done yet because no money in the budget has been dedicated to this yet. No date has been set or anticipated for when this will be accomplished.

Discussion of outreach materials that will be needed:

- -How to Comply manual is very essential (top priority among states)
- -Respirator fact sheets (second most requested)

## **PERC Website presentation** (Kaci Buhl): Coordinated through UC Davis Extension.

- -Considering things needed for WPS implementation, C&T, etc.
- -How to Comply Manual was completed in 6 months, and reviewed by OECA, etc. They are available now through Gemplers. The paper is not great because they were trying to keep the cost down to one dollar per copy. A PDF is available for printing within states (available on PERC website). Link to the manual chapter by chapter can be sent.
- -WPS Quick Reference Guide is available in PDF in English and Spanish.
- -WPS Train the Trainer Manual (250 pages) Hard copy versions are available from the National Pesticide Safety Educational Center. PDF is also available so states can print on their own.
- -WPS Train the Trainer presentation (8 hours to deliver). Is available on the PERC website. EPA approval number is used as the credential for delivering this training. A Spanish version is in process now. Sample training exercises are available to supplement this presentation.
- -WPS Worker-Handler presentations are available and accompanied by sample exercises.
- -WPS Train the Trainer online modules will be available in November 2017.
- -WPS Respiratory Protection Requirements resource is in process. It is written for agricultural employers. This will address flexibility (persons with beards, etc.).
- -Inventory of WPS Training Materials is searchable, and is being revised to make it more user-friendly.
- -WPS updated Central Posting Materials are being developed. Working with an illustrator to get these materials developed. First versions will be available in May.
- -WPS videos for workers and handlers...worker video available now, handler video not available yet. Will be available on YouTube and will be downloadable from website. They will not produce DVDs due to cost and storage.
- -WPS Fact sheets, FAQs...a WPS "Compliance Suite".

#### **Enforcement Update** (Philip Beard):

- -The region now has 107 open cases. Several cases have been closed in 2017, with over \$20,000.00 in fines.
- -Claims from plant growth regulators have been an issue. There is very little case law on Plant growth regulators.
- Determinations by HQ BPPD on whether these products are considered PGRs normally required.
- -2017 FIFRA focus areas: Product integrity, Border Compliance, WPS (tribal inspections)
- -Enforcement Resources: All are available on EPA website...EPA WPS inspection guidance, listing of minimum risk pesticides exempted from registration (25b), Electronic reporting for pesticide establishments (production reports, etc.).

**How to handle Confidential Business Information** (Justin Mullenix): Presented an outline of how CBI should be collected. Anything revealing manufacturing processes, quality control information, testing methods to identify inert ingredients, production data or confidential statement of formula is considered CBI. In Region 4, Pamela Moultrie should be contacted with questions on CBI.

## **Regional Grants Update** (Stuart Perry):

- -Status of grants and the Continuing Resolution: continuing resolution ends on 4/26/17. EPA is unsure of Congressional plan for rest of FY and budget. EPA has awarded 2 grant awards to each of the grantees (55% of full year funding). Best scenario is to have one more award as part of rest of year CR. Region 4 is willing to work with individual states to deal with budgetary adjustments that may be necessary.
- -Sustainability in EPA assistance agreements-promotes recipients to incorporate sustainability into their assistance agreements. Effective date applies to new and supplemental grants awarded on of after October 1, 2017. Rollout during work plan negotiation, the EPA Project Office will discuss with recipients the feasibility of incorporating sustainability into the plan.

There have been some staff changes in the grants management office. Stuart provided a list of staff and their responsibilities.

### **State Agency Highlights:**

**Georgia:** Has been working on auxin herbicide presentations. Have held 6 trainings across the state. Around 2000 applicators have been through the training. Have gotten several 24cs pertaining to several different compounds. Commercial and Private applicator cards have been reprinted to reflect completion of the training. Tracking applicators that are not licensed and issuing cards to these people stating that they have completed the training. Cards for these people are a different color than those issued to licensed applicators. Currently have 22 inspectors. Have recently hired several new people.

**North Carolina:** Pollinator Protection...completed a one year subscription to BeeWatch. This has gone well and have 5500 hives registered. This has been well-

accepted by beekeepers, but now trying to get pesticide applicators to register. Have had several (5) 24cs dealing with auxins. Dan Kenny and Kay Montague helped get a 10mph wind restriction on the 24cs for the 5 products. Dr. Allen York has conducted 38 training sessions this spring. 2900 people attended these trainings which were required by the 24c label. NC may offer a one-hour credit course for private applicators. 2 hours credit were given to commercial applicators who completed the training. Department is engaged in a major capital project (94 million) to build a facility that will house several laboratories along with the NCDA&CS activities. Structural program...has a vacant field supervisor position and field inspector position. New rule in 2017 that allows new termiticide treatment methodology to not meet current standards if efficacy data support the treatment method. Have seen an increase in soil fumigation cases this year for various reasons. Increase in animal poisonings (carbofuran, etc.). Not as many bee kills so far this year.

**Florida:** Enforcement has concentrated largely on structural fumigation. A couple of ag. cases are going on now. Went from 500 to 1700 structural cases. Ag logic (aldicarb product) is being produced, so FL is meeting with the producer of this product. Clean Sweep program is being used again. Close to eradicating giant African land snail, also battling cone head termites...have moved 9 miles from original location. Is a big problem because they are not allowed to treat in "natural areas". Are continuing to deal with Zika virus. Mosquito Mate got an EUP to work on *Aedes aegpti* and *Aedes albopictus* in FL (baiting system using a female mosquito to contaminate her eggs). Florida is petitioning for a Section 18 for the use of this control method. They have faced various difficulties in this process. The registrant is at least a year away from getting a full Section 3 for this control method. Screw Worm has been eradicated in the Keys.

**Misissippi:** Made auxin herbicides restricted-use products in MS. A structural training facility is going to be built. They should have a facility built by next year. July 31-August 3<sup>rd</sup> will host a basic inspector training. Pesticide waste disposal program is in place.

**Alabama:** Have had some turnover in staff, lost 2 field supervisors. Have had level funding, which resulted in a 5% cut to the budget. Have been working on auxin herbicide issues. Got wind speed reduction and mandatory training in place for applicators using these products (through 24c). Thirteen plant inspectors will begin doing WPS Inspections – they have hosted a training event for these individuals in Alabama. AL has had a lot of Section 18s this year. They are working on the database system upgrades (US Plants). They have encountered some difficulties with this transition. It has taken a lot of time.

## **2017-18 PIRT /PREP Update** (Kelly Engle, Dea Zimmerman):

Kelly Engle reviewed the PIRT schedule for 2017.

- -July 24-27 Savannah GA, Advanced PIRT
- -Still need a 2018 Tribal PIRT host and one national PIRT host for 2018 Contact Kelly Engle (202-564-2059)

Dea Zimmerman reviewed the PREP programs that are scheduled for 2017.

- -Applicator Certification PREP was held April 4-6 in Baltimore, MD. 32 SLAs were in attendance. Discussed Rule requirements, cert. plan approval process, resource/material needs.
- -Water Quality PREP will be held May 16-19. Topics will include water quality program design, analytical considerations, OPP/WQ data in risk assessments, POINTS, Glyphosate, EQI work.
- -Public Health PREP (July 17-20) Nominations open until May 1st. Focus will be on the processes for managing issues related to the control of public health pests -Laboratory Issues PREP (October 23-26) Nominations will be due August 1<sup>st</sup>. Will include attendance by quality assurance officers, not just lab directors.

FIFRA work plan and report template: Plan to convert to a web-based system from Excel. Work began in February, and the scheduled completion date is the end of May 2017. Performance measures will be included in the work plan template.

**Regional Training Update** (Pat Livingston): Two regional trainings have been funded for 2017.

- -May 8-11 WPS Rule revisions in Asheville, NC.
- -July 31-August 3, New Inspector Training in Starkville, MS.
- -Also, Region 4 conducted WPS Rule revision training for inspectors from AL, GA, and MS March 14-15 in Montgomery AL.
- 2018 Regional training courses will be in Kentucky (structural). Still need another host state and topic for 2018.

Share Point – there needs to be a system to enable electronic communication between states and EPA. Anticipate that all Region 4 states will have open access to the site. Email addresses for anyone who is to have access to the site must be sent to Pat Livingston. The goal is to have this site set up by the summer of 2017.

Two WPS inspections will be performed this year on tribes within Region 4.

## **Pollinator Rule Update** (Randy Dominy):

Policy to Mitigate Acute Risk to Bees from Pesticide Products has been released by the EPA. Randy reviewed this policy. The policy is very focused and particular with regard to managed pollinators as well as crops being pollinated. He also addressed questions with landscape contractors and non-ag applications. In essence, the label is the law, and MP3s should help mitigate some of the risks in these applications. There is no plan to have an outreach program that targets landscape applications of products. The pollinator advisory boxes and icons may be eliminated from the product labels.

### **State Agency Highlights:**

Clemson: The legislature attempted to make glyphosate exempt from regulation. A legislature opened the Pesticide Control Act and attempted to remove specifics from the Regulations and put them into the Pesticide Control Act. They also attempted to remove the criminal penalty option and make all violations civil. We are fully staffed now, but one field supervisor is retiring in June. This will involve territory realignment. Are finishing up structural fumigation inspections. No notification in SC for structural fumigations, but considering this for the future. No anticipated requirement for auxin herbicide training. Have had increase in mothball misuse cases. Master termite technician and apprentice termite technician programs are growing. Wood infestation report violations have decreased since SC started a WIF report training.

**Tennessee:** Ricky Foster retired in March, so they are interviewing for his position. They have been released from the avian influenza quarantine. No pending legislation at this time.

**Kentucky:** Pollinators...nearing the end of building a mapping system for pollinators (ESRI), this will be accessible from the web. This site will be for beekeepers, specialty crops, etc. The beekeepers and applicators will be anonymous to people using the system outside of the Kentucky Department of Agriculture. Licensing and enforcement database program is being rebuilt. This will be much more user-friendly. The current system is not working well, it is outdated. Working on an online payment method for license renewals and fees. Recently established a series / system of upward mobility for pesticide inspectors (inspector 1,2,3, and Supervisor).

### **Election of new Pre-SFIREG Chair and Vice-Chair:**

Tim Drake, Chair Derrick Lastinger Vice-Chair

## Second Day Meeting, April 19, 2017

**New Respirator Requirements under WPS** (Robin Tutor Marcom, 252-744-1008, tutorr@ecu.edu):

Enforcement for respiratory protection can be frustrating for inspectors. Respiratory protection requirements were revised in the new WPS. When a respirator is required for an application, a handler must be fit tested and trained before the handler performs any activity requiring the respirator. Record keeping related to this is two years.

#### Where to start:

- -Complete chemical and label inventory.
- -Determine what types of respirators are needed and under what conditions they will be used; include on medical questionnaire.
- -Do not purchase respirators prior to medical clearance and respirator fit testing. Not all individuals will pass medical clearance and respirators are not "one size fits all".

Labels must be read in the context of what is being asked.

NIOSH classifies all respirators. It is important to use the correct NIOSH classified respirator for specific purposes. Some are for particulate matter, others for vapors, etc. Counterfeit respirators are in the market that have NIOSH letters out of correct order, so care must be taken to not use a counterfeit.

-Respirator cartridges are color coded for specific chemicals (green-ammonia, black-organic vapors, yellow, acid gases and organic vapors, etc.). The correct cartridge must be used for good protection.

Respirator change-out schedule must occur under certain circumstances such as clogged filters, when it is damaged or torn, after 8 hour of cumulative use, per manufacturer's instructions (write the dates and times of use on the cartridge).

For gas or vapor removing cartridges, they must be changed after 8 hours of continuous use, when the filter is clogged, when a taste or odor is sensed by the wearer, etc.

Medical Clearance is required prior to fit testing and respirator use. This was adopted from OSHA. Additional medical clearance is required when: Employee reports medical symptoms related to the ability to use the respirator, Medical professional recommends further evaluation, Information from the respirator program including observations made during fit testing and program evaluation indicates a need; change occurs in workplace conditions that may substantially increase physiological burden on the employee.

The medical questionnaire must be filled out by employee prior to going for a medical clearance. It is a standard OSHA form. There are Spanish translated forms.

Medical clearances can be performed by private physicians, occupational health company, occupational health clinic, urgent care clinic, online provider, Agromedicine institute. Hands-on medical clearance is recommended but not required. Some people who perform medical clearances will travel to remote areas (farms, etc.) to provide this service. Many physicians are not trained in occupational health, so they will not provide medical clearances.

Medical clearances may be granted without or with limitations, or may be denied if employees have health conditions that prohibit them from using a respirator.

In areas where the worker will be in a high-heat situation, using respirators can cause issues (heat stroke, heart attack, etc.) if the person has pre-existing health conditions (high blood pressure, etc.).

Medical clearances are usually granted for one to three years. There is no required time limit.

Fit testing can be qualitative or quantitative. Tight fitting respirators cannot be worn by anyone with facial hair or any condition that interferes with the seal of a respirator. Loose fitting respirators can be acquired, but they are much more expensive.

Fit testing classes can be provided to growers, and training is recommended prior to farms conducting fit tests on their own. OSHA protocol must be followed when performing all steps in a fit test. Fit test records must be filled out. The individual will be given a fit test card with their records on it.

Fit testing must be performed every year, and this must be documented...unless you are using a loose-fitting respirator. These do not require an annual fit test.

Training must be performed in a way the employee can understand and must include specific information related to respirator use, cleaning, storage, inspection, fit, as well as medical information related to respirator use.

Any agricultural establishment can get respirators and other safety equipment from Grainger at discount rates, if going through North Carolina. Can set up an account either online, or by calling (877-202-2591), Account number for farmers to use 880421185. For questions, Farmers should call the NC Agromedicine Institute (252-744-1008).

## **Kaput feral hog bait discussion** (Meredith Laws, Randy Dominy):

Randy: EPA engaged with many states and listened to their concerns over this product. The Region contacted Mark Suarez and Meredith Laws regarding the registration of the product. The registration caused a lot of surprise among states. There were many comments about use directions, disposal, secondary feeding on carcasses, endangered species, are other products available for this use? Also, many areas use feral hogs for hunting and meat.

The product was registered federally as a general use product, but states can go a step further and restrict its use.

Meredith: The first EUP was issued in 2014, but EPA has been in contact with the registrant since 2012. Texas was very much in support of their EUP. It was registered in January of 2017. Warfarin has been registered for over 60 years as rat bait. This bait has 1/5 the concentration of warfarin that is found in rat bait. Toxicity to birds is extremely low. It is not expected to affect birds. It also is expected to have minimal risk to other mammals because the concentration is so low in the formulation. Because of risk assessments, this product was not made an RUP. It did not trigger any of the criteria for an RUP. There were not many negative comments related to the proposed registration. Texas and Louisiana were in favor of its registration. This product poses little to no worker/handler risk.

Human consumption of feral hogs...there is a dye in the bait that is bright blue, so fat in and around the gut will be affected and dyed a bright blue, so anybody intending to use a baited hog for meat will be aware that it has been poisoned.

Label amendments are being considered such as increasing the required weight on the hopper lid to prevent raccoons from opening the traps. Bait delivery system as related to feeding by raccoons and black bears was of great concern.

Steve Cole requested that the study done under the EUP in Texas be made available to state lead agencies for review. Meredith said that this data could be made available, and additional input from states regarding desired label amendments would be taken into consideration.

Charlie Clark suggested that the comments be funneled through the SFIREG process and presented at the meeting at the end of June.

What states are planning to register the product now? Meredith is not sure, but she assumes Texas, Louisiana, and Mississippi.

## Flowertown Bee Incident in SC (Mike Weyman, Jennifer Tsuruda):

Mosquito control was done in an area in response to several travel-related cases of Zika in a concentrated area. DHEC protocol in this situation is to require an application of adulticides in the area. Trumpet EC (naled) was used to treat the area aerially. Every beekeeper in the area was called except for the beekeeper who reported the bee kill. All other beekeepers in the area protected their hives and had no loss of bees.

Label statement regarding timing of application was just a recommendation and not a requirement. There also was an exemption for application once a threat to public health had been declared.

There was no violation against the applicator because the label was followed. Now there is litigation in process against the applicator.

Media coverage was immediate and inflammatory. Claim was that millions of bees were killed.

SC has multiple agencies that deal with honeybees and people get confused regarding which entity needs to be contacted to report a bee kill. This is problematic because collecting samples for residue analysis must be done immediately after a kill occurs.

There is no mandatory hive registry in SC, but beekeepers still have the expectation that their hives will be protected.

There is a 24 hour advance notice requirement in SC for any public health aerial application of pesticides.

**ASPCRO Update** (Ryan Okey): Fumigation workshop coordinated by ASPCRO is being held next week in Florida. This is geared to give EPA personnel more experience in fumigation. Bed Bug Committee is active and is going to draft model regulations for heat treatments, use of dogs, etc. Summer meeting will be in Burlington VT. in August. It will be held on a Wed-Friday. Pyrethroid workshop was held in December, get in touch with Liza Fleeson Trossbach for details on this.

**AAPCO Update** (Tony Cofer, Kathy Booker): The leadership of AAPCO realizes that the EPA is undergoing a transition with old staff leaving and new staff coming on. The relationship between AAPCO and EPA needs to be re-established. Tony reviewed the structure and purpose of SFIREG and AAPCO. He encouraged states to consider serving on EQI and POM working committees. The term is for three years. EPA-State learning exchange is taking place where EPA and state officials meet and exchange perspectives, needs, etc. Bonnie Rabe is the current President of AAPCO. One goal is to get engagement / membership and participation from all 50 states.

SFIREG Update (Pat): No schedule has been set yet for the next meeting. It likely will be held at the end of June. Because of federal product registration decisions, more responsibility is being put on the states by EPA to make products state RUPs or to put conditional use requirements on state registrations (auxin herbicides, kaput, etc.). Over 6000 people have been trained by several states this year in application of auxin herbicides. There has been an increase in states in the region considering or having approved production of industrial hemp and/or CBD oil. Feral hog and kaput issue is of concern to states. The non-functional status of CPARD is of concern to the states. Label review manual changes performed by the EPA did not include input from the states. The EPA staff were not aware of the process through which the manual was developed (collaboration among states and EPA) when these changes were made. We would like to see the Regulator in Residence program to be brought back by the EPA. It was a very useful program. There is a deficit of useful information in the respirator guidance materials / manual.

Pat asked what a significant cut to EPA funding and thus to the states would mean in the states. (Alabama would cut travel, not fill positions, and maybe lose two positions), MS...same as AL. KY would be in the same situation, may lose positions and renegotiate level of work under the grant. FL has no positions tied to the grant, but would renegotiate the grant work plan. SC would renegotiate outputs, and may not rehire vacant positions. TN would renegotiate outputs and consider keeping positions vacant. GA would have an impact to outputs, positions would not be in danger, clean-day would be cut. North Carolina would have to cut four position, perhaps as many as three in the field. Pat reviewed the results of the survey conducted at the beginning of the meeting.

Fall Pre-SFIREG will be held on October 23-25 (travel day on 23<sup>rd</sup>) at the Courtyard hotel in Decatur, GA.

The Meeting adjourned at 11:59.