

STATE FIFRA ISSUES RESEARCH & EVALUATION GROUP (SFIREG)  
JOINT MEETING MINUTES OF THE PESTICIDE OPERATIONS AND MANAGEMENT  
(POM) & ENVIRONMENTAL QUALITY ISSUES (EQI) COMMITTEES  
APRIL 10-11, 2017  
U.S. EPA, POTOMAC YARDS, CRYSTAL CITY, VA

Called by: Bonnie Rabe, NM, POM Chairperson & Gretchen Paluch, IA, EQI  
Chairperson

Minutes by: Amy Bamber, AAPCO Executive Secretary

Monday April 10, 2017 8:30am

**POLLINATOR RISK ASSESSMENT AND PRODUCT LABELS**

Meredith Laws, EPA/OPP

Tom Steeger, EPA/OPP/FEAD

Steeger began by asking the committee what questions they would like to cover. Allran said that NC has done lots of outreach. They understand the January 2017 policy but would like an overview for risk mitigation, knowing that any products with foliar, acute risk, and managed hives are addressed, but for other products will there be risk mitigation? Steeger replied that it is not a hazard based approach, it is a risk based approach (i.e. if maximum rates exceed risk quotients). There are no blanket efforts or statements, compared to the neonicotenoid labels.

- They have moved the environmental hazards into the directions for use. Environmental hazard will say if the product is toxic to bees (hazard language). The directions for use will be much more specific.
- There will be a letter to the registrants coming out in about a month to address the 43 compounds contained in appendix A of the January 2017 policy.
- There is no big emphasis for non-ag products, but they will meet agency standards.
- Penn State and USDA ARS are doing research on surfactants. Other classes of pesticides have been looked at, and concern is a moving target.
- Steeger stated that the impact of mites confounds the agency's ability to determine pesticide specific issues outside of acute insecticides.
- The SAP determined that ingestion of pollen is a more important route of exposure than water used for cooling hives and diluting honey.
- They have seen that the primary routes of exposure for apis spp is not the same for other spp. The agency is evaluation if apis bees are still a good surrogate for all bee risk.
- Neonics have the bee icon while acute risk in products other than neonics do not have the bee icon. Neonics with new a.i.s have been going through a strong risk assessment process while existing a.i.s have a new environmental assessment process for reregistration.
  - In January 2017 the draft risk assessment for a group of neonics was posted. In the fall there will be a draft environmental risk assessment

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posted. By next spring all neonics will have gone through the  
environmental risk assessment.

- EPA is still determining if the RT25 is protective and robust in all situations. The RT25 list is being updated. Steeger is reviewing data to support RT25, but validity of the approach is a concern. The pollinator task force on EPA's pollinator site will be updated to show what has been reviewed. EPA is not sure when they will be able to update the website.
- The label review manual will be updated but that is a longer process for incorporation
- Chemical specific mitigation is the approach moving forward, with an emphasis on ag vs. non-ag products.

### **DICAMBA**

Marion Johnson, EPA/OPP/RD

States have been asking if restrictions can be done through the SLN process (i.e. wind speed changes, mandatory training). Johnson would prefer states to look at state authority to address reporting, monitoring, etc. and exhaust those avenues before working on SLNs, but EPA will consider them. More restrictive SLN language is difficult to enforce federally.

- FL, NC, GA, AR, AL have SLNs for training and wind speed. States are variable in their approaches, for instance FL has a 31 year old rule that restricts organoauxin products already in place.
- Ag Retailers Association will be hosting webinars on dicamba, Lastinger will forward to Bamber for distribution to the membership

Thuy Nguyen, EPA/OPP

See presentation on laboratory issues with Dicamba.

Nguyen said that DCSA is the residue to look for on dicamba resistant plants. EPA likes the method QuEChERS, but it needs refinement. They recently did a round robin with 10 labs, using different methods and equipment. Based on the results EPA developed a new method for high resolution mass spectrometry using non-gmo crops.

- For enforcement look for DCSA and +5-OH if possible
- Sampling very close to the application is important (within a month)
- Freeze samples below -40C to preserve samples (slows degradation)
- 60ppb is known to cause damage
- New method for HRMC, reduced limit of quantification to 3PPB, studying feasibility of method to be used with LC-MS/MS

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**OPP UPDATE**

Yvette Hopkins, EPA/OPP/FEAD

**Glyphosate**

The Scientific Advisory Panel (SAP) issued its report March 16, 2017. Once EPA has reviewed the report and made any necessary changes in its risk assessment, EPA intends to release all the components of its full human health and ecological risk assessments for a 60-day public comment period.

EPA is currently scheduled to publish its glyphosate risk assessments in 2017. Once public comments have been reviewed, EPA intends to publish a Proposed Interim Registration Review Decision that may detail specific risk mitigation measures for glyphosate, if needed. The Proposed Interim Registration Review Decision for glyphosate will be available for another 60-day public comment period. An Interim Registration Review Decision will be issued after public comments are considered.

More information about:

- the glyphosate SAP: <https://www.epa.gov/sap/meeting-materials-december-13-16-2016-scientific-advisory-panel>
- glyphosate: <https://www.epa.gov/ingredients-used-pesticide-products/glyphosate>

**Four Neonicotinoid Risk Assessments – not discussed**

In January, EPA published preliminary pollinator-only risk assessments for the neonicotinoid insecticides clothianidin, thiamethoxam, and dinotefuran and also an update to its preliminary risk assessment for imidacloprid, which we published in January 2016. The updated imidacloprid assessment looks at potential risks to aquatic species, and identifies some risks for aquatic insects.

The assessments for clothianidin, thiamethoxam, and dinotefuran, similar to the preliminary pollinator assessment for imidacloprid showed: most approved uses do not pose significant risks to bee colonies. However, spray applications to a few crops, such as cucumbers, berries, and cotton, may pose risks to bees that come in direct contact with residue. In its preliminary pollinator-only analysis for clothianidin and thiamethoxam, the EPA has proposed a new method for accounting for pesticide exposure that may occur through pollen and nectar.

The 60-day public comment period will begin upon publication in the Federal Register, which is still pending.

EPA encourages stakeholders and interested members of the public to visit the dockets for the neonicotinoid pesticides and sign up for email alerts to be automatically notified when the Agency publishes the next documents for review and comment. View the [neonicotinoid registration review schedule](#) for links to the individual dockets: <https://www.epa.gov/pollinator-protection/schedule-review-neonicotinoid-pesticides>.

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Water Soluble Packaging

On April 5, 2017, EPA sent a letter to pesticide registrants about revised directions for use for products manufactured in water soluble packages. Currently, handling instructions vary across WSP products and most may not adequately address the improper practices that have been observed in the field. Clear and consistent labeling instructions will enhance worker protection. We are requiring registrants to submit updated labels by May 5, 2017, for their products manufactured in WSP reflecting only the changes to the "Directions for Use" section that we provided. We appreciate the work by the states and the Agricultural Handler Exposure Task Force on identifying and helping resolve this issue.

RFA for Field Implementation Meeting Support

EPA's Office of Pesticide Programs is soliciting applications for one or more cooperative agreements to manage a Field Implementation Meetings Support program. EPA expects to provide up to \$500,000 annually, depending on the Agency's budget, for a total of five fiscal years (2017 through 2021).

The cooperative agreement will provide financial assistance to one or more eligible applicants to organize and facilitate dialogue and collaboration on pesticide safety programs, mainly the [Certified Applicator regulation](#) and the agricultural [Worker Protection Standard](#). Both regulations aim to reduce the risk of pesticide poisoning and injury among handlers, applicators, bystanders and the public.

EPA must receive proposals through [Grants.gov](#) no later than – 11:59 p.m. Eastern Standard Time on May 12, 2017. [View more information on this Request for Applications \(EPA-OPP-2017-002\)](#).

Clarification of Placement of Required First Aid Statements on Pesticide Product Labels

The FIRST AID memorandum was posted to docket EPA-HQ-OPP-2016-0454 on December 7, 2016 for a 30-day public comment period. In December 2016 the Agency received four requests for an extension of the comment period for an additional 60 days (these four requests/comments are on the public docket). The Agency accepted the requests and the docket remained open for public comment until March 7, 2017. The Agency's goal in issuing this memorandum was to clarify where first aid statements must be placed on pesticide product labels. First aid statements provide important information concerning appropriate first aid in the event of accidental exposure to a pesticide.

The memorandum states that first aid statements must be immediately visible on a pesticide product when the product is sold or distributed. It should not require opening a booklet or other manipulation of the label to read the first aid statement. For the most hazardous products (Toxicity Category I), the first aid statement must appear on the front panel unless we have approved something different. For

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Toxicity Categories II or III, the first aid statement can appear on the front, side or back panel, but it must be visible without manipulation of the label. If a registrant chooses to list first aid statements for Toxicity Category IV products, this language must also appear on a visible panel.

Recent variation in types of labels has led to less consistent placement of the first aid statement. Because of the importance of first aid information, the Agency decided to make it clearer to registrants where first aid statements must appear on labels. EPA's Office of Pesticide Programs sent a memorandum to pesticide registrants clarifying the required placement of first aid statements.

The Agency has received several comments from industry on the memorandum and is currently reviewing them. The Agency has not made a final decision yet on the path forward.

Antimicrobial Wipes and "Keep out of Reach of Children" Statement

EPA has received questions about the use of antimicrobial surface wipes by children, since many products include "Keep out of reach of children" on the EPA-approved label. We are looking into development of informational materials to help schools in particular understand the importance of following this label direction. Several state IPM newsletters have included or are considering including warnings on this topic, and we expect to add information to our school IPM website. An example of a state IPM newsletter item: [The University of Arizona's School & Home IPM Newsletter for March](#) had a lead article on *IPM for Microorganisms: Cleaning, Disinfecting, and Sanitizing* (The University of Arizona's [School & Home IPM Newsletter for March](#) had a lead article on *IPM for Microorganisms: Cleaning, Disinfecting, and Sanitizing* (<https://cals.arizona.edu/apmc/docs/2017MarchAZschoolandhomeIPMNewletter.pdf>).

Label Review Manual Updates

We are in the process of updating and refreshing the Label Review Manual, including correcting updating where changes have occurred, adding a table of contents to each chapter, reorganizing sections and subsections, updating hyperlinks and changing to plain writing style (where possible). Chapter 1 and Chapter 10 were completed in 2016, with more nearing completion (2, 3, 15 and 16 are the next in line).

View the Label Review Manual at <https://www.epa.gov/pesticide-registration/label-review-manual>. Submit any suggestions to the Labeling Consistency Committee mailbox (<https://www.epa.gov/pesticide-labels/forms/pesticide-labeling-questions-answers-form>).

Globally Harmonized System of Classification and Labeling (GHS)

The Globally Harmonized System of Classification and Labeling (GHS) is a global

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initiative to promote standard criteria for classifying and communicating chemical hazards on chemical labels and Safety Data Sheets (SDS). This includes product identifiers, precautionary statements, pictograms, and signal words. EPA has not adopted GHS for pesticides. An Office of Pesticide Programs workgroup is considering potential rulemaking options to require the use of GHS language on U.S. pesticide labels for relevant physical and acute toxicity hazards.

GHS implementation would increase regulatory coordination across the federal government and reduce non-tariff related barriers to trade internationally, as many countries have implemented, or are implementing, GHS. In the United States, the Occupational Safety and Health Administration (OSHA) and Department of Transportation (DOT) have updated their respective regulations to incorporate GHS. Currently, the EPA-regulated pesticide label and corresponding OSHA-regulated SDS can offer inconsistent hazard information for pesticide products.

GHS also facilitates the use of alternative testing methodologies, tools that will enhance the quality of risk assessment and risk management decisions with significant reductions in animal testing. OECD is only developing new test guidelines using the GHS categories. Without GHS, EPA must develop a cross-walk between the category systems to utilize the data under EPA's regulatory framework.

Additional considerations include initial cost burdens for industry, staff training, and resource constraints for EPA and states associated with submissions during the implementation phase. The workgroup will continue raising stakeholder awareness on this potential initiative throughout FY 2017 before any final decisions on rulemaking are made.

More information on GHS and pesticides: <https://www.epa.gov/pesticide-labels/pesticide-labels-and-ghs-comparison-and-samples>

Other Items of Interest

The label matcher app is open for beta testing until May 31. Learn more about this application at <https://www.epa.gov/pesticide-labels/mobile-application-pesticide-label-matching>.

[The next PPDC meeting is May 3-4, here in Potomac Yard South.](#)

## **OECA UPDATE**

Anthony Matusik, EPA/OECA

Updating FIFRA Project Officer Manual:

- OECA/OPP are Working to update the FIFRA Project Officer Manual, this manual has not been revised since 2002. The updated PO Manual has

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recently been sent out to the Regions for review and should be available to  
States sometime in May for comment.

2018-2021 FIFRA Cooperative Agreement Guidance

- As of February 14th OPP/OECA sent out the final version of the 2018-2021 FIFRA CAG; some key updates:
  - Updated C&T: The principal activities for the C&T program area will be to implement the January 4, 2017, rule revisions
  - Updated WPS: The principal Pesticide Worker Safety Program activities will be to implement the November 2, 2015, rule revisions

Added two new required program areas:

- Product Integrity: goal is to safeguard the basic integrity of the pesticide registration process to protect human health and the environment
- Border Compliance: Prevent and reduce risks of unsafe products entering the United States by eliminating the distribution of unregistered, misbranded or adulterated pesticides

SSTS 2016 Reporting Year:

- Over 45% of all pesticide establishments chose to report electronically with SSTS this year, up from 43% at the close of the reporting cycle (March 1<sup>st</sup>), so the regulated community has continued to report electronically
  - <https://www.epa.gov/compliance/electronic-reporting-pesticide-establishments>
- Over 200 companies have taken advantage of registering new establishments electronically
- We will be sending out a survey to SSTS users to identify areas of improvement and will continue to enhance the system

OECA published a webpage to list all active EPA-registered foreign and domestic pesticide establishments

- This list was recently updated as of February 2017 (the last time it was updated was in 2015)
  - Once the SSTS system is refined we will work to update this list periodically throughout the year.
  - <https://www.epa.gov/compliance/national-list-active-epa-registered-foreign-and-domestic-pesticide-and-or-device-producing>

PIRT Updates

- Advanced PIRT: July 24-27, 2017 in Savannah, GA
  - Registration/Nomination scheduled to begin next week

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- Visit PIRT website: <https://www.epa.gov/compliance/pesticide-inspector-regulatory-training-pirt>
- Still need 2018 Tribal PIRT host and one more 2018 National PIRT host

#### EQI Concurrent Breakout Session

Emily Ryan provided an update on POINTS transition status. This would take place following the CPARD transition.

EQI committee reviewed the [2015 POINTS SFIREG paper](#) regarding technical considerations for the upcoming transition of POINTS. EPA and EQI were looking for clarification from states on other uses of the POINTS. The committee put together an initial listing of current state water quality program uses, outside of the grant requirements in the Cooperative Agreement Guidance. The committee discussed the need to expand this list to allow additional representation for all states and will initiate a survey through AAPCO to this end.

Questions discussed included:

How does EPA view or use POINTS?

Do SLAs view POINTS with respect to data entry and use?

How can POINTS/data entry be improved to better reflect incidents vs. reporting?

How to capture nation-wide assessment of POINTS?

Is data entry still valuable to EPA?

Do data in POINTS get used by SLAs?

How is the data used or could the data be beneficial to the SLAs?

#### **WATER QUALITY PREP UPDATE**

Carol Black, WSU (by telephone)

The Minnesota Department of Agriculture has been very helpful in developing the course. The planning committee has identified main topics, including:

- How are water monitoring data used?
- Different fundamental approaches amongst states
- What are we doing with POINTS. It is moving out of WSU for hosting.
- State program sharing
- Looking at EQI topics through time
- How are label statements affected by state programs?
- TES
- Glyphosate
- Neonics
- 'Hot' Chemistries (atrazine?)

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- Field Trip to Discovery Farms and Cannon Falls, MN to look at monitoring and the Ag Certification program
- Benchmarks-MCL-HAL differentiation

The attendees will be 2/3 new program people, and about 1/3 experienced water program managers.

EQI should provide 2-3 topics to Black, likely to include benchmarks and how to use them (when and how do programs make decisions), and how to use various ways to measure findings. PREP session to include definitions of MCLs, health advisories, HEBs, etc.

**OVERVIEW AND DISCUSSION OF PLANT BACK RESTRICTIONS WHITE PAPER**

Gretchen Paluch, IA, EQI Chairperson

Paluch reviewed the issue and referenced several documents related to the development of an issue paper, including SFIREG's comments on Docket Number NRCS-2014-0009. The committee discussed the challenges with wording (such as using cover crops to designate vegetation that later may be used for feed or food), label review, and cooperation from USDA NRCS to support resolution and safe production of feed and food. Bamber will collate the materials and the Issue Paper will be redistributed to the EQI in September and reengagement with USDA NRCS.

**STATE UPDATES ON ISSUES RELATED TO ENVIRONMENTAL QUALITY PROGRAMS**

EQI Committee Members

Tim Drake, SC: South Carolina's water monitoring shows high nitrates, but not much else. There is some atrazine in exceedance of thresholds in groundwater. The MP3 is getting finalized, with mosquito control and infectious diseases remaining as key pollinator issues in the state. SC tends to have more structural versus agricultural challenges.

Lebelle Hicks, ME: Sediment impacts on lobsters continues to be worked on, with bifenthrin being the pesticide of most concern.

John Allran, NC: NC collaborated on an FAQ paper for pollinators; sampling mosquitos has begun, but *A. egyptii* hasn't been found yet' Renee Wood has replaced Henry Wade; the disposal program is picking up about 150,000lbs of waste pesticide a year' driftwatch has over 1400 registered apiaries, now they are trying to get applicators and specialty crop growers to use the system; their Pollinator Protection Collaborative has been successful in developing chapters for MP3 on

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'relationships' between different crops/pests and pollinators/ still working on MP3 metrics for the state; have not had many bee cases.

Davis Daiker, FL: In the groundwater program they are reviewing new a.i.s, new uses, etc. using SciGrow and PRZM' they are in the 18<sup>th</sup> year of the citrus gw monitoring network and have seen some shifts in groundwater due to registration actions, not they are really looking at new a.i.s in citrus (mostly insecticides). Surface water is monitored by the DEP and they are in their 5<sup>th</sup> year. Nothing too much in TES. Lots of Zika outreach and education occurring.

Gary Bahr, WA: upgrading education and outreach; doing use inspections and nursery inspections. Groundwater monitoring will be looking at dacthal and dcpa this summer in a cooperative project with Oregon in onions. Salmon ESA is requiring monitoring in 12-14 watersheds. POC (50% of benchmark) azoxystroban, malathion, captan, chlopyrofos, simazine and others. For the AAPCO website, it was suggested that the laboratory committee put together a water monitoring section.

Carrie Leach, IN: they have a 5 year monitoring plan for groundwater in place. The AAPCO laboratory committee meets on even months and discusses laboratory methods and new issues. Daiker is interested in screens versus methods. Leach described the swabs vs. vegetation residue study which showed that it is good to always get a vegetation back up sample when getting swab samples. Study to be distributed to EQI members.

Gretchen Paluch, IA: Iowa has implemented the fieldwatch/driftwatch tool for the 2017 crop season. Multiple state-wide programs are in progress including the state Iowa Pest Resistance Management Plan, Nutrient Reduction Strategy, and conservation efforts through the Iowa Monarch Research Consortium. These projects involve coordination across programs and will have direct/indirect impacts on water quality.

**COMMITTEE OUTLOOK ON NETWORKING AND PROGRAM RESOURCES WITHIN WATER QUALITY PROGRAMS**

**Gretchen Paluch, IA, EQI Chairperson**

Emily Ryan to provide an updated list of EPA OPP contacts to EQI.

The committee discussed informational needs of state water quality programs including up-to-date lab methodologies for pesticide analysis in groundwater and/or surface water monitoring. This may include specifics such as costs, detection limits, turnaround time, screening sets, etc. EQI members to participate in the AAPCO Laboratory Committee bimonthly call to request more information and resources available. In addition, the committee discussed outlook/opportunities for

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networking with sister agencies at the September WC meeting on pesticide issues in water.

POM Concurrent Breakout Session

**MULTIPLE PRODUCT PACKAGING**

Tony Kish, EPA/OPP/ PM Fungicide Branch  
Jose Gayoso, EPA/OPP/ Regulatory Advisor Antimicrobials  
Matthew Sunseri, MN, POM Committee Member

See Sunseri's presentation.

- Multipacks are individual products shrink wrapped together
- Copacks are 2 a.i.s in one container
- There will be an A label, a B label and if there is an overarching name for the pack, there should be a C label.
- Registration guidance from EPA is desired for both industry and state regulatory programs. The label review manual and EPA's label website have varying descriptions; updating these would prove beneficial to states who are conducting registration inspections.
- The states would like clarification from EPA for the September 2017 JWC meeting.

**KAPUT FOR FERAL HOG CONTROL**

Meredith Laws, EPA/OPP/RD  
Mark Suarez, EPA/OPP/RD

Suarez reviewed the registration and areas to note:

- The swine label is 1/5<sup>th</sup> the concentration of warfarin than is used for rats and mice. Swine are very susceptible to warfarin and do not require a higher percentage of the a.i.
- EPA used EUP data from Texas using warfarin as bait to support the registration
- Eco risk assesement found the use to be low risk, basically the only risk was to scavenging/carnivorous animals but they would have to feed on the poisoned carcass for 5 days straight. The likelihood of that happening is low, therefore the use is considered low risk.
- Mitigation consists of hog collection (destroy, bury, burn), a dye in the bait to prevent humans from consuming the poisoned hog, and posting in the area of baiting. Increased the lid weight on the feeder/bait station to 17lbs to further limit non target exposure.
- The benefits of controlling feral hogs are considered high compared to the risk, and the hogs are known to cause significant damage where they have become feral.

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- There has been some backlash from hunters and folks who use the hogs for meat production.

**\*\*\*\*THE INS AND OUTS OF 24(C) REGISTRATIONS**

Marion Johnson, EPA/OPP

Johnson described the Section 24(c) process for the committee. The committee is interested in discussing the development of a Section 24(c) tool, which would be similar to the Section (18) tool developed by PREP several years ago. The discussion indicated:

- The guidance was outdated and in need of revision.
- States handle the work associated with 24(c) registrations along with the risk assessment.
- If more than a few states are looking for 24(c) registration for a specific product, then it is the Agency's position that a Section 3 registration may be necessary.
- The new federal form is currently in the Office of Management and Budget (OMB)
- States support adding a Q & A section should be added to the label review manual to better provide information.

**\*\*\*\*\*REVIEW OF SECTION 18 EXEMPTIONS FROM REGISTRATION**

Marion Johnson, EPA/OPP

Twanda ?, EPA/OPP

Johnson described the Section 18 process for the committee. Committee discussed the potential need for the Section 18 registrations of herbicides as needed to control resistant weeds. Johnson stated that the Agency would consider resistance weeds an emergency however requested that these requests would need to provide thorough documentation as to how these new tools will replace existing tools to be effective in resistant weed control. Supporting information i.e. spray schedules, etc. would be beneficial to include.

**\*\*\*\*PROGRAM RESOURCES AND COORDINATION MECHANISM**

Dave Scott, IN

Scott described the e-enterprise opportunity, which Region 5 has utilized to develop the label-matching tool with the Office of the Indiana State Chemist as a lead cooperator. Currently e-enterprise is working on an inspection management database, and they are looking for beta testers for the label matching tool from the states. Testing will continue through May 31<sup>st</sup>. Contact Scott for more information.

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**UNREGISTERED PRODUCTS USED AS PESTICIDES**

Rose Kachadoorian, OR, POM Committee Member

See Kachadoorian's presentation.

- Issues should be referred to the EPA regional offices.
- Giguere suggested guidance from EPA.
- How to reach out to schools or others controlling environments where children are present?
- Hopkins will share the Office of General Council response on devices
- EPA wants state input on if piopesticides ECR are high priority
- Sulfur is a big issue for several industries and would like OECA guidance. The issue is whether claims are made on the labels. If there are no claims it is a difficult situation for EPA to address.

**DISCUSSION OF EPA OPP'S CONSIDERATION OF STRUCTURAL FUMIGANT RE-EVALUTATION AND OR THE OIG REPORT: ADDITIONAL MEASURES CAN BE TAKEN TO PREVENT DEATHS AND SERIOUS INJURIES FROM RESIDENTIAL FUMIGATIONS**

Derrick Lastinger, GA, POM Committee Member

- EPA is currently waiting on data and do not have a solid timeline to address the issue.
- The OIG has been holding biweekly meetings.
- National Pest Management Association (NMPA) has been developing stewardship materials.
- Does EPA keep numbers for the pounds of a.i. used? BEAD may have some numbers for ag uses, but not likely for structural. It is a more difficult use to monitor.
- Do states allow subcontracting of structural applications? Not known across the board. ASPCRO is developing a survey.
- In two weeks NPMA and ASPCRO will host 10 EPA scientists in Fort Lauderdale, FL for hands on training to support the reregistration process. This will include USDA PPQ APHIS import/export uses.

Tuesday April 11, 2017 9:30am

**ENDANGERED SPECIES CONSULTATION**

Phil Villanueva, EPA/OPP/EFED

EPA is working on steps 1 and 2 on the consultation process. Looking at exposure of chlopyrifos, diazinon, and malathion. The final BE for these a.i.s was out for comment in January 2017 and the agency received a good amount of comments. TES tools are available on the Internet but in a provisional status and still need

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qa/qc for terrestrial effects. EPA hopes the final BE for carbaryl and methomyl will be available at the end of 2017; right now they are waiting to post documents related to the draft BE. They have updated water models to address concerns for large flowing water bodies. This summer EPA expects there will be draft bi-ops for chlorpyrifos, diazinon and malathion ready to post. They would like refinement in geospatial data exposure estimates for marine habitats and timing and exposure estimates. They would like to find ways to use the spp tox data earlier in the process. It is likely EPA and the Services will have some stakeholder meetings this year, at least a few workshops. Paluch offered state water data for use and model refinement.

### **CERTIFICATION AND TRAINING**

Nancy Fitz, EPA/OPP

See presentation. The rule is in legal policy and priority review right now. They expect it to be final on May 22, 2017. Drake commended EPA for their excellent communication and responsiveness to working with the states on the rule.

### **PYRETHROID ASSESSMENT UPDATE**

Justin Housenger & Kevin Costello, EPA/OPP/PRD

The risk assessment was published in the fall of 2016, and included 8 synthetic pyrethroids and 5 pyrethrins.

- The down the drain assessment found risk above the level of concern for aquatic spps., but not benthic spps. LOC were exceeded. Drinking water filters did take out about 90% of the pesticides.
- The structural and O&T uses risk assessment found that acute and chronic exposures exceeded the LOC for fresh and salt water invertebrates. The benthic also exceed the LOC.
- Agricultural uses were also found to exceed the LOC for acute and chronic, fresh and saltwater exposures.
- Mosquito adulticides included 3 a.i.s and ULV applications. Chronic and acute, fresh and saltwater invertebrate assessments exceeded the LOC. This assessment is a bit muddled because there could be impacts from other uses of the same products affecting the assessment.
- The honeybee risk assessment, which is Tier 1 of the pollinator framework, used limited data, but found that the field risk indicates high risk. They don't have any larval data, and are hoping to get some for larval sensitivity.

The ecological assessment was grouped across pyrethroids and had a 60 day comment period. The comment period will be extended an additional 60 days when EPA is permitted to publish the notice in the Federal Register.

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Human health is more complicated than expected, and that assessment will be available for comment in 2018. PEA cannot base outcomes on which generation of pyrethroids are looked at. While they are doing a lot of modeling, they are getting different outcomes than expected and across generations.

Concerning pollinators, they have concerns with adults, and will see larval risks through a data call in. If there is high risk then PRD will evaluate at the colony level.

EPA doesn't expect the proposed decision will include full bee consideration due to complex data and lab protocols.

Giguere asked if previous label changes have made any difference in lower risk? Costello responded that they seem to be having an effect but will need more time to see how much of an effect. They hope to see a reduction in levels found in water.

Daiker noted that there are not many new mosquito adulticides available and it is important to not lose these tools. While they are seeing resistance already, we want to keep rates up to decrease resistance formation. Costello acknowledged that Zika has prioritized vector control for the pyrethroid uses.