

Region 8 Pre-SFIREG
September 26, 2017
Denver, CO

Topics:

1. Western Region Meeting – 2018
2. Colorado Issue Paper – Marijuana & pesticide use
3. Safety Data Sheets vs. Pesticide Labeling
4. M-44 Label Changes
5. Amine 4, 2,4-D Label Language

1. Western Region Meeting – 2018. Please save the date. The 2018 Western Region Pesticide Meeting will be held May 9-May 11, 2018 at the Ramkota Hotel and Conference Center in Bismarck ND. Group rate of rooms at \$91 per night if reserved by April 16. Contact: Jerry Sauter, Environmental Scientist North Dakota Department of Agriculture, 600 E. Boulevard Ave Dept. 602 | Bismarck, ND 58505 P: 701-328-2980 | Fax: 701-328-4567 www.nd.gov/ndda

2. Colorado Issue Paper – Marijuana & pesticide use. Discussion continues regarding the issues of MJ production and pesticide use. Local regulatory authorities considering establishing their own set of “tolerances” regarding pesticide use, contrary to FIFRA. [Noted as 11:30 am SFIREG agenda Topic 12/4]

3. Safety Data Sheets versus Pesticide Labeling. Raised as an issue from the USFS – Helena, MT Office. Ref: US EPA PR Notice 2012-1, Material Safety Data Sheets as Pesticide Labeling, April 20, 2012. Questions rose from another agency when a SDS has more restrictive language regarding PPE versus the Pesticide Label. Seeking clarification from EPA HQ (Pont/Fitz). Resolved w/ USFS through discussion w/ Richard Pont, EPA.

4. M-44 Label Changes. Wildlife Services is amending their policies regarding the use of M-44’s, with possibility that these policy changes will be introduced as label revisions to the 26 use restrictions.

5. Amine 4, 2,4-D Label Language. The specific label language of concern is: "Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for non-target species, non-target crops) within 250 feet downwind. Because any specie, not identified on the label, could be considered a "non-target" specie, any use of this where any specie not identified on the label could exist, whether present or not, within 250 ft of the use of this pesticide makes this an inconsistent use. Attached copy of correspondence from Colorado.



Hank Uhden <hank.uhden@wyo.gov>

Amine 4, 2,4-D Label language issue

1 message

Lopez - CDA, Matthew <matthew.lopez@state.co.us>

Wed, Sep 27, 2017 at 10:53 AM

To: Hank Uhden <hank.uhden@wyo.gov>, John Scott <johnw.scott@state.co.us>

The specific label language of concern is: "Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for non-target species, non-target crops) within 250 feet downwind.

Because any specie, not identified on the label, could be considered a "non-target" specie, any use of this where any specie not identified on the label could exist, whether present or not, within 250 ft of the use of this pesticide makes the use an inconsistent use.

2,4-D products:

- Loveland Products, Amine 4, 2,4-D, EPA Reg No. 34704-120 (2,4-D Amine)
- Tacoma Ag, LLC EPA Reg. No. 83520-13 (2,4-D Amine)
- Biesterfeld US, Inc. – EPA Reg. No. 62575-8 (2,4-D Amine – 6 Herbicide)
- Ragan and Massey, Inc. – EPA Reg. No. 84009-4 (2,4-D Amine Weed Killer)
- Winfield Solutions, LLC – EPA Reg. No. 1381-103 (2,4-D Amine 4)
- Albaugh, LLC – EPA Reg. No. 42750-19 (2,4-D Amine 4)
- Champion Crop Care – EPA Reg. No. 91543-2 (2,4-D Amine Weed Killer)

Additionally, a couple of ester products have the same language.

- Winfield Solutions, LLC - EPA Reg. No. 1381-102 (2,4-D LV4)
- Dow Agro Sciences - EPA Reg. No. 62719-50 (2,4-D Bee 4)

Now this is not a comprehensive list, this was a very cursory review for this language.

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Pesticide Section



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