

**Region 8 Pre-SFRIG
May 11, 2018
Western Region Pesticide Meeting
Bismarck, ND**

Topics:

1. C & T/CPARD
 2. QMP/QAAP
 3. 25(b) work group
 4. Device registration
 5. Federal Credential process
 6. Amine 4, 2,4-D Label Language
-
1. **C&T/CPARD** : Discussion continues on the release date and functionality of CPARD. States are concerned on the implementation of the database and how it will affect the states implementation and approval of their new C & T plans. States have concerns of data entered previously being lost. Wyoming recommended EPA conduct periodic phone calls with the states (quarterly) discussing updates and time line of implementation with the SLA's. EPA stated there would be crosswalk the states will use when developing their plans. The question was asked if EPA would accept partial plans or if the plan needs to be complete prior to implementation. Ability of the new system to have multiple users to input data.
 2. **QMP and QAAP discussion:** Follow up with Region 8 states on how their discussions with Linda Himmelbauer, EPA Region 8 and the approval of the SLA QMP and QAAP. General discussions were the discussions went well and EPA R8 will get back to each state on potential changes and approval of the documents. States feel the process could be streamlined to make the process simpler and more efficient for both the states and EPA. Discussion was held on the difference between the QMP and QAAP.
 3. **25(b) Work Group:** Bruce Jacobson of SD gave an update on the 25(b) work group that he is participating. It was suggested that companies assign product number through EPA to give states tracking ability with 25(b) products. If the numbers vary it would lead to new formulation and product. This would allow states to compare labels. The 25(b) work group is working on a universal statement of formula. Suggestion was made to standardize organic and natural designations.
 4. **Device Registration:** Colorado brought up registration of ozone devices. They are a device that creates a pesticide and are sold with a material to create the pesticide. They are oxidizers for cannabis. The question on human health issues (asthma trigger) PPE issues/questions.
 5. **Federal Credential Process:** States discussed the lengthy process of obtaining credentials and reaccreditation. It was stated a better clarification of the process is needed to be distributed to the states. North Dakota suggested a PIRT or PREP course

to allow people to obtain their credentials. A course would be a one stop shop, step by step process.

6. **Amine 4, 2,4-D label language (Follow up from December SFRIG):** Issue raised by CO, clarify statement of use: cannot prevent off target specie exposure with current label language. Specie is not identified. "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, know habitat for non-target species, non –target crops) within 250 ft. downwind.

7. Next Pre-SFRIG Meeting will be September 25, 2018 in Denver, CO

8. 2020 is the next Western Region Pesticide Meeting in Bend, OR.



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.

Matthew A Lopez
Manager, Pesticide Enforcement
Pesticide Section



P 303.869.9058 | F 303.466.2860
305 Interlocken Parkway, Broomfield, CO 80021
matthew.lopez@state.co.us | www.colorado.gov/ag

CONFIDENTIALITY NOTICE: The information contained in or attached to this transmission is intended solely for its authorized recipient and may be confidential. If you are not the intended recipient, or responsible for delivering some or all of this information to the intended recipient, you have received this transmission in error. If you have received this communication in error, immediately notify the sender and delete or properly destroy this transmission, including any attachments.