

**Future of POINTS (Pesticides of Interest National Tracking System)
and Water Quality Reporting**
SFIREG Environmental Quality Issues Working Committee

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Background:

In 2007, after withdrawing the proposed State Management Plan Rule, the EPA Office of Pesticide Programs released the Pesticides of Interest National Tracking System (POINTS) to track state-generated water quality data. States were tasked with evaluating an initial list of 57 pesticides of interest based on their potential to affect water quality. EPA would use this information to manage risk on a national level and inform the pesticide re-evaluation process. This would also support the goal of the EPA Pesticides in Water Program, which is to ensure that pesticides do not adversely affect the nation's water resources.

EPA began requiring that FIFRA State Lead Agencies (SLAs) use POINTS to report on their water quality monitoring efforts. For the FY 2008-2010 FIFRA Cooperative Agreement Guidance, EPA listed the use of POINTS as a Required Activity in the Pesticides in Water Required Program Area. States were required to use POINTS to evaluate pesticides of interest (POIs), identify pesticides of concern (POCs), describe how their programs were managing these POCs and demonstrate how they were making progress toward reducing the potential for these POCs to negatively impact water quality. The current grant guidance, FY 2018-2021 FIFRA Cooperative Agreement Guidance, still lists the use of POINTS as a Required Activity, with the aforementioned tasks still listed as required actions within the guidance. These requirements will be valid through 2021.

Since its release, many states have invested considerable time and energy into developing water quality monitoring programs that support the objectives of POINTS.

In 2017, under Chairperson Dr. Gretchen Paluch, the SFIREG Environmental Quality Issues (EQI) Working Committee (WC) conducted a survey of states to determine key aspects of how states utilize POINTS. The survey asked states to rank their uses of POINTS, from most essential use to least essential use.

The 2017 SFIREG EQI WC survey found that states use POINTS in a variety of ways, including:

(1) Using POINTS as a reporting tool.

The SFIREG EQI WC survey found that the most commonly cited use for POINTS was as a reporting tool. This use aligns with the primary purpose of POINTS, which is as a reporting mechanism. This use satisfies the EPA FIFRA Cooperative Agreement Guidance, in which the use of POINTS is listed as a Required Activity.

(2) Using POINTS as a communication tool.

The SFIREG EQI WC survey found that the second most commonly cited use for POINTS is as a communication tool. An example of this is communicating water quality findings or concerns with counterparts from neighboring states, as well as with water quality staff in other agencies within a state.

(3) Using POINTS as a decision-making tool.

The SFIREG EQI WC survey found that many states use POINTS as a way to direct the activities of the state's water quality program. An example would be establishing a multi-year plan to evaluate the pesticides of interest (POIs), establishing funds to generate or otherwise acquire water quality data to support state decisions regarding pesticides of concern (POCs), and putting state resources for reducing POCs' risks to water quality.

(4) Targeting the POINTS POCs for resource investment.

Comments submitted by states as part of the SFIREG EQI WC survey identified an additional use some states have for POINTS: targeting POINTS POCs for resource investment. Many states have taken steps to develop internal action levels around the POINTS POCs. They have also dedicated resources to programs aimed at decreasing the potential for POCs to negatively impact water quality. These programs include outreach and education, increased monitoring and increased enforcement activity.

(5) Using POINTS as a way to monitor progress of state water quality programs.

Comments submitted by states as part of the SFIREG EQI WC survey also indicated that POINTS can be used as a mechanism by which to monitor the progress of a water quality program. Many states have built their water quality programs around achieving the objectives identified in POINTS, and thereby use POINTS as a way to monitor the progress of their water quality program.

(6) Using POINTS as a program activity record.

Lastly, another cited use for POINTS in the SFIREG EQI WC survey is as a record for program activity. Many states use POINTS to track water quality program

activities as they align with POINTS objectives. For example, states can use POINTS to track the results of their evaluations of the list of pesticides of interest, and their management of the pesticides of concern.

Issues:

Currently, the POINTS database is being housed on a server at Washington State University (WSU). In July 2015, EPA informed the SFIREG EQI WC that the POINTS database would be moving in-house to an internal EPA server. However, that move has not yet happened, and there is no definitive timeline for the move to take place. In its current situation, there is limited technical support being provided to update the program or fix any issues as they arise.

The SFIREG EQI WC has identified the following issues:

- (1) POINTS is currently inadequately supported by EPA.
 - a. EPA is not currently offering support for training state personnel.
This needed support would include providing training materials such as training videos and written guidance materials.
 - b. EPA is not providing funding or technical support for POINTS.
The EPA is currently not providing funding for the hosting or maintenance of POINTS. EPA is not providing support for technical needs such as addressing any issues that arise with the program, providing password support for users and conducting updates. Washington State University staff are currently providing as much technical support as possible with zero funding or compensation. The last WSU invoice for hosting and maintenance services was paid by EPA on 6/30/2015. Since that time, EPA has not been paying the hosting and maintenance costs for POINTS.
 - c. EPA is not providing funding to improve POINTS.
In 2015, the SFIREG EQI WC conducted a review of POINTS and identified needed improvements with the system. Kirk Cook, then SFIREG EQI Chairperson, submitted a White Paper in November, 2015, delineating 4 necessary improvements to POINTS, and 4 recommended improvements to POINTS.

The 4 necessary improvements identified in the 2015 White Paper were:

- (1) Improve tracking of POI to POC justifications;
- (2) Expand the ability to query the database and download data;
- (3) Provide uniformity in the pesticide nomenclature used in the POI list;
- (4) Revise and streamline the questions that populate POINTS in the data entry phase.

The 4 recommended improvements identified in the 2015 White Paper were:

- (1) Establish a POINTS forum made up of designated SLA contact persons for POINTS;
- (2) Increase size limits for text boxes;
- (3) Conduct regular training on use of POINTS;
- (4) Allow entry of new information without the loss of previously entered data.

None of these improvements have been implemented so far.

- (2) There is currently no timeline established or funds available to bring POINTS in-house onto an EPA server. States need to plan for the future of their water quality programs. The current uncertainty regarding the future of POINTS makes it difficult for states to effectively plan future water quality activities.
- (3) POINTS is currently a valuable tool used by many states to enhance their water quality programs. Since its release, states have put a great amount of effort and resources into the implementation of POINTS. POINTS currently contains a significant amount of state-generated data that would be detrimental to states to lose.
- (4) Reporting in POINTS is currently a requirement in the EPA grant agreement. The current grant guidance document, the FY 2018-2021 FIFRA Cooperative Agreement Guidance, lists the use of POINTS as a Required Activity. This requirement will be valid through 2021. If POINTS becomes unviable due to lack of federal support, states will not be able to comply with their Cooperative Agreement. If reporting in POINTS is no longer required by EPA, and no Pesticides in Water Required Activities are issued to replace POINTS reporting, states may lose leverage to fund pesticide water quality monitoring programs. EPA needs to demonstrate concrete support for state water quality programs, and this is accomplished in part by support of POINTS or an adequate replacement for POINTS.

- (5) States need a way to report water quality data to EPA. POINTS is currently the vehicle by which the EPA monitors and tracks state water quality issues. Without generating an adequate replacement for POINTS, the dissolution of POINTS would hamper that process. The momentum of the national efforts to protect water quality from the potential for contamination by registered pesticides will be impaired. The message is that the EPA is no longer prioritizing water quality.

Ideas for a Temporary State Sourced Resolution:

- (1) Maintain POINTS on Washington State University (WSU) server.
States consider POINTS to be a valuable resource. Therefore the loss of POINTS would be detrimental to the operations of SLA water quality programs. Washington State University (WSU) staff have informed the SFIREG EQI WC that they are willing to maintain and support POINTS on the WSU server as long as necessary funding is provided.
- (2) Provide funding for POINTS.
Carol Black, POINTS contact person at WSU, informed the SFIREG EQI WC that WSU would need \$4,500 per year to host the database and provide 40 hours of maintenance. The SFIREG EQI WC proposes that individual states establish contract agreements with Washington State University to provide funding support for POINTS. This would be a temporary solution to keep POINTS viable and accessible. However, this would not be appropriate for a long-term solution.
- (3) Host training resources on AAPCO website.
Provide a link on the AAPCO website to existing training resources, such as the 2017 EPA-generated POINTS training webinar featuring Patti Tenbrook, and the Frequently Asked Questions (FAQs) document generated by Bruce Wilkinson.

SFIREG EQI WC Request to EPA:

- (1) **EPA clarify its long-term plan for POINTS funding and water quality reporting**
- The last invoice EPA paid to Washington State University for the hosting and maintenance of POINTS was 6/30/2015. Therefore, POINTS has been unsupported by EPA for nearly 4 years. The SFIREG EQI WC requests that EPA declare its intentions for the future of POINTS and its plans for funding POINTS. Funding support from states would be a temporary solution to keep POINTS viable and accessible for the near future. However, this is not an acceptable long-

term solution. The SFIREG EQI WC requests that EPA establish a long-term plan for funding POINTS and communicate that plan to SFIREG.

(2) EPA clarify what is acceptable for water quality reporting

- POINTS is currently unsupported by EPA, and yet the use of POINTS for water quality reporting is a required activity in the FIFRA Cooperative Grant Agreement. The SFIREG EQI WC requests that EPA clarify whether unsupported databases such as POINTS are acceptable for reporting under the FIFRA Cooperative Grant Agreement.

(3) EPA address the 2015 SFIREG EQI WC request for improvements to POINTS

- As described in 1(c) of the Issues Section, Kirk Cook, then Chairperson of the SFIREG EQI WC, submitted a White Paper in November, 2015, identifying 4 necessary improvements to POINTS and 4 recommended improvements to POINTS. None of these improvements have been made so far. The SFIREG EQI WC requests that EPA establish a timeline to address these necessary and recommended improvements, and that EPA communicates that timeline to SFIREG.

Conclusion:

States have invested valuable time and resources into POINTS. Some states have incorporated POINTS into their decision-making process and water quality program goals. Losing POINTS without an adequate replacement system would be a step backward in the national effort to monitor and improve water quality. It is essential to take steps to ensure the continuation of this quality program. It is important that POINTS continue, or that EPA develops an equally functional replacement program. The SFIREG EQI Working Committee proposes that POINTS be maintained on a WSU server, supported by state-generated funding, as a temporary resolution to the situation. The SFIREG EQI WC requests that EPA clarify its long-term plan for funding POINTS, clarify what is acceptable for water quality reporting, and address the 2015 SFIREG EQI WC request for improvements to POINTS. The need for the continuation of POINTS will impact how states negotiate the EPA Grant Guidance Agreement document in 2020.