AAPCO UPDATE
Rose Kachadoorian, OR, AAPCO President

The AAPCO Spring Meeting will be March 8-11, 2020 in Alexandria, VA
The AAPCO Pollinator Protection Work Group will be distributing a National Managed Pollinator Protection Program Assessment in the middle of October, 2020. This will help give EPA an assessment of the programs.
Current areas of involvement for AAPCO include addressing POINTS and issues with the grant requiring reporting into an unsupported database; a letter to the US Senate regarding biostimulants, including support for Table 4 in the draft guidance that distinguishes between pesticides and fertilizers; a letter to FDA supporting that Hemp be classified as a food crop.
Kachadoorian also thanked the states for sending in letters to EPA supporting the use of 24(c) authority for the states. EPA is expected to put something out for comment, and all states are encouraged to submit letters of support for state authority at that time. Kachadoorian also thanked the many active AAPCO workgroup members, including 25(b), technology, and hemp.

SFIREG UPDATE
Liza Fleeson Trossbach, VA, SFIREG Chairperson

Fleeson Trossbach thanked the working committees for their development of several important issues and provided updates related to SFIREG’s letter to EPA regarding action levels for pesticides on cannabis; comments on the pyrethroid label amendments; impurities found in pesticide formulations; the Clarifly/pass through insecticides letter that went out to states; the cover crops and plant back restrictions issue paper has been given to EPA; the POINTS white paper that AAPCO is addressing; letter to EPA regarding cannabis pesticide registrations; the dicamba workgroup’s guidance document; working on devices, including the R4 white paper.
The next full SFIREG meeting will be December 9-10, 2020 in Crystal City, VA.

EPA OPP UPDATE
Yvette Hopkins, EPA/OPP/FEAD, SFIREG Liaison

Newly Available Data to be Incorporated into Pyrethroid Proposed Interim Decisions

www.epa.gov/pesticides/newly-available-data-be-incorporated-pyrethroid-proposed-interim-decisions

Based on a thorough review of recent data, EPA concluded that there are reliable data to support reducing the current threefold (3X) Food Quality Protection Act (FQPA) safety factor for pyrethroids to 1X, and that margin will be safe for infants and children. This reduced safety factor will be incorporated into the upcoming pyrethroid proposed interim decisions for registration review.
EPA is required to apply a 10X margin of safety, or safety factor, to human health risk assessments to account for potential prenatal and postnatal toxicity of infants, children and pregnant women when exposed to pesticides. The law allows a different margin of safety only if the Agency has reliable data supporting a conclusion that the revised safety factor would protect infants and children.

The Agency considers the FQPA safety factor to have two components: one assigned to pharmacokinetic (PK) differences and another for pharmacodynamic (PD) differences. The PK component refers to the process of chemicals being absorbed, distributed, metabolized and excreted from and in the body. The PD component refers to how a chemical affects the body’s tissue.

In 2010, EPA reviewed the data relevant to assessing the health risks of pyrethroid exposure to infants and children and found that they supported the removal of the safety factor for PD. However, the data were insufficient to change the PK portion of the uncertainty factor, thus leaving a 3X safety factor.

More recently, EPA has performed a new evaluation of available guideline and literature studies, as well as data generated by the Council for the Advancement of Pyrethroid Human Risk Assessment. The Agency concluded that the FQPA safety factor for pyrethroids should be reduced to 1X for all populations (1X for PD and 1X for PK) because the data indicate that there is no increased sensitivity, or in other words, there are no PK differences between adults and children.

Pyrethrins and pyrethroids are insecticides widely used in and around households, including on pets. They are also used in treated clothing, mosquito control, and agriculture.

We invite stakeholders to review the methodology and EPA’s conclusion to lower the FQPA Safety factor. EPA will be accepting comments on the white paper once the Federal Register notice announcing availability of the pyrethroid Proposed Interim Registration Review Decisions is published later this year. Once the Proposed Interim Decisions are published, comments should be submitted to www.regulations.gov under docket # EPA-HQ-OPP-2008-0331.

EPA’s New Pet Product Reporting Format Seeks to Improve Safety Monitoring, Ease Regulatory Burden

As part of an ongoing effort to improve the safety of pet spot-on flea and tick products, the EPA is inviting all pet spot-on registrants to use standardized and sales reporting templates for annual incident reporting.

This procedural change will support the objectives of pet spot-on mitigation by ensuring that consistent, high-quality, useful data are received in a timely fashion.

These changes also ease the burden on registrants. By using the templates and following the related implementation guidance, registrants can now request to change from quarterly to annual submission of enhanced incident reporting, and they can request removal of the two-year conditional registration expiration date. Use of the templates will become a condition of registration.

EPA will continue to actively manage these registrations through registration review and by reviewing labels for mitigation whenever registrants request amendments. EPA may still initiate action at any time to address concerns if it identifies unreasonable adverse effects. Such actions can range from mandatory label changes up to and including cancellation of the registration.

EPA first implemented use of the templates in 2018 following a successful pilot program with registrants.

EPA Takes Action to Provide Accurate Risk Information to Consumers, Stop False Labeling on Products

www.epa.gov/newsreleases/epa-takes-action-provide-accurate-risk-information-consumers-stop-false-labeling

EPA issued guidance to registrants of glyphosate to ensure clarity on labeling of the chemical on their products. EPA will no longer approve product labels claiming glyphosate is known to cause cancer – a false claim that does not meet the labeling requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The State of California’s much criticized Proposition 65 has led to misleading labeling requirements for products, like glyphosate, because it misinforms the public about the risks they are facing. This action will ensure consumers have correct information, and is based on EPA’s comprehensive evaluation of glyphosate.

In April, EPA took the next step in the review process for glyphosate. EPA found – as it has before – that glyphosate is not a carcinogen, and there are no risks to public health when glyphosate is used in accordance with its current label. These scientific findings are consistent with the conclusions of science reviews by many other countries and other federal agencies.
On Feb. 26, 2018, the United States District Court for the Eastern District of California issued a preliminary injunction stopping California from enforcing the state warning requirements involving glyphosate’s carcinogenicity, in part on the basis that the required warning statement is false or misleading. The preliminary injunction has not been appealed and remains in place.

California’s listing of glyphosate as a substance under Proposition 65 is based on the International Agency on the Research for Cancer (IARC) classifying it as “probably carcinogenic to humans.” EPA’s independent evaluation of available scientific data included a more extensive and relevant dataset than IARC considered during its evaluation of glyphosate, from which the agency concluded that glyphosate is “not likely to be carcinogenic to humans.” EPA’s cancer classification is consistent with many other international expert panels and regulatory authorities.

Registrants with glyphosate products currently bearing Proposition 65 warning language should submit draft amended labeling that removes this language within 90 days of the date of the letter.

EPA Solicits Applications for National Farmworker Training Program

www.epa.gov/pesticides/epa-solicits-applications-national-farmworker-training-program

EPA’s Office of Pesticide Programs is soliciting applications for a cooperative agreement to support a National Farmworker Training Program. This program will develop national pesticide safety training, education and outreach for farmworkers and their families in rural agricultural areas.

The goals of the program will be to:

- Work with farmworker support organizations, growers, crew leaders, and agricultural extension professionals;
- Help ensure the safe use of pesticides by focusing on prevention and reducing exposure to pesticides;
- Enhance safe working conditions for agricultural workers at the local, state and national levels; and
- Promote environmental justice for low-income, low-literacy, and predominantly non-English speaking farmworkers.

EPA expects to provide up to $500,000 annually, depending on the Agency’s budget, for five federal fiscal years (October 2020-September 2025).

EPA must receive proposals through Grants.gov no later than 11:59 p.m. Eastern Time on October 15, 2019. Our Pesticide Worker Safety Cooperative Agreements page provides
information about this and other Requests for Applications. To apply, go to grant opportunity EPA-HQ-OPP-2019-004 at Grants.gov.

EPA Seeks Public Comment on Pesticide Applications for Hemp

www.epa.gov/newsreleases/epa-seeks-public-comment-pesticide-applications-hemp

EPA announced the receipt of 10 pesticide applications to expand their use on hemp. The 10 requests are the result of the December 2018 Farm Bill provisions that removed hemp from the Controlled Substances Act, legalizing hemp for commercial use and production.

To ensure transparency and improve EPA’s process for considering pest management tools for the emerging American hemp industry, EPA is seeking public comment on these applications. The list of pesticides can be found in the Federal Register notice. Comments should be submitted on or before Sep. 23, 2019, to www.regulations.gov under docket number EPA-HQ-OPP-2019-0369.

Once public comments are received, EPA anticipates deciding about the possible use of the specified products on hemp before the end of 2019 to help growers make informed purchasing choices for the upcoming growing season. Moving forward, EPA will review, approve or deny applications for use on hemp as the agency would for any other use site.

The enacted 2018 Farm Bill legalized hemp with a tetrahydrocannabinol (THC) concentration of no more than 0.3% on a dry-weight basis. Thus, the 2018 Farm Bill allows for expanding cultivation of hemp, but not marijuana.

EPA Proposes Rule to Revise Pesticide Crop Grouping Regulations for Herbs and Spices


EPA is taking public comment on a proposed rule to expand and revise the pesticide crop grouping regulations.

With these revisions, EPA seeks to:

- Enhance our ability to conduct food safety evaluations on herb and spice crops for tolerance-setting purposes;
Promote global harmonization of food safety standards;
Reduce regulatory burden; and
Ensure food safety for agricultural goods.

The proposed rule and related documents are available in docket EPA-HQ-OPP-2006-0766 at www.regulations.gov. Comments on the proposed rule will be accepted until October 28, 2019.

EPA sets tolerances, which are the maximum amount of a pesticide allowed to remain in or on a food, as part of the process of regulating pesticides that may leave residues in food.

Crop groups are established when residue data for certain representative crops are used to establish pesticide tolerances for a group of crops that are botanically or taxonomically related. Representative crops of a crop group or subgroup are those whose residue data can be used to establish a tolerance for the entire group or subgroup.

EPA is proposing two new large groups — “Crop Group 25: Herb Group” and “Crop Group 26: Spice Group” — as well as several other technical amendments to the crop group system. We anticipate that lower-risk pesticides could come forward for group tolerances and registration on herb and spice crops because of the proposed crop groups. Additionally, fewer field trials would be needed for regulatory decision-making on many similar herb and spice crops.

This proposed crop group rule is based on petitions submitted to EPA by the U.S. Department of Agriculture’s Interregional Research Project Number 4 and is the fifth in an ongoing series of revisions to the crop grouping regulations.

EPA Releases FAQs for Certain Antimicrobial Product Performance Efficacy Test Guidelines


The following three tests have been updated:

- 810.2100: Sterilants, Sporicides, and Decontaminants, Guide for Efficacy Testing
- 810.2200: Disinfectants for Use on Environmental Surfaces, Guide for Efficacy Testing
The updated guidelines were initially posted in February 2018, with an implementation date of February 28, 2019. Since the publication of the three updated guidelines, EPA received numerous inquiries from stakeholders seeking clarification of several topics within the guidelines. In order to allow time to address stakeholder concerns, the agency delayed the February 28, 2019, implementation date for the updated guidelines by six months to August 28, 2019. In response to stakeholder requests, EPA has generated the Frequently Asked Questions Web resource to provide prompt and transparent guidance to all applicants regarding commonly asked questions concerning the updated 810 guidelines.

[1] The confirmatory data section in the 810.2000 test will be placed on hold pending new guidance that will be vetted through an additional public comment.

EPA to Hold Environmental Modeling Public Meeting in October

www.epa.gov/pesticides/epa-hold-environmental-modeling-public-meeting-october

On Oct. 16, 2019, EPA will hold its semi-annual Environmental Modeling Public Meeting. This is a public forum for pesticide registrants, other stakeholders, and EPA to discuss current issues related to modeling pesticide fate, transport and exposure for risk assessments in a regulatory context.

The meeting will focus on:

- Sources of usage data (relating to the actual application of pesticides, in terms of the quantity applied or units treated);
- Spatial applications of usage data;
- Model parameterization;
- Extrapolation of usage data to fill in gaps;
- Temporal variability of usage; and
- Updates on ongoing topics.

There will also be presentations on incorporating pesticide usage data into environmental exposure and ecological risk assessments.

Registration is required. Requests to participate in the meeting must be received on or before Sept. 23, 2019. Please contact Rebecca Lazarus or Zoe Ruge at OPP_EMPM@epa.gov to register.

More information can be found at www.regulations.gov in docket # EPA_FRDOC_0001-24430. Sign up for updates and abstract requests for future Environmental Modeling Public Meetings.
EPA Seeks Comment on Process for Evaluating Pesticide Synergy for Ecological Risk Assessments

www.epa.gov/pesticides/epa-seeks-comment-process-evaluating-pesticide-synergy-ecological-risk-assessments

EPA has developed an interim process to review synergy data for mixtures of pesticide active ingredients and potentially incorporate that information into our ecological risk estimates. The interim process will be available for public comment on or before October 24, 2019 on regulations.gov in docket EPA-HQ-OPP-2017-0433.

EPA generally evaluates pesticide ecological risks based on toxicity information from studies conducted with single active ingredients. This is based on best available evidence on pesticide interactions and the expectation that those interactions are rare. More recently, patent claims of synergy against target pests have raised questions and concerns about the adequacy of estimating risk of each individual active ingredient alone, especially for products mixed prior to application or products containing multiple active ingredients. Synergy occurs when the combined effect of two or more active ingredients are greater than the sum of the effects the chemicals would have individually. EPA hopes this process will close the gap between patent claims and our ecological risk assessments.

The specific feedback EPA is looking for is included in section IV of the Federal Register notice. Based on feedback and our analysis of the results of this process, EPA will determine whether synergy data supporting patents is useful for our ecological risk assessments and whether we should modify the interim process.

EPA Receives Request for Experimental Permit to Combat Mosquitoes

www.epa.gov/pesticides/epa-receives-request-experimental-permit-combat-mosquitoes

EPA has received an application for an experimental use permit that would allow Oxitec to study the use of genetically engineered mosquitoes to reduce mosquito populations. EPA is sharing a description of the application with the public for a 30-day comment period, closing October 11, 2019.

Aedes aegypti mosquitoes can spread several diseases of significant human health concern, including the Zika virus and dengue fever. Oxitec’s proposal is to conduct additional research on
reducing these mosquito populations and to gather information that could support a subsequent application for broader use in the United States.

Oxitec is proposing to release genetically engineered male mosquitoes into the environment to mate with wild female mosquitoes. Male mosquitoes do not bite people. These males are modified in such a way that causes their female offspring to die as larvae. Male offspring would survive to become fully functional adults with the same modifications, which can provide multigenerational effectiveness so that ultimately Aedes aegypti mosquito populations in the release areas decline.

Oxitec’s proposed experimental program is designed to take place over 24 months on up to 6,600 acres in Harris County, Texas, and Monroe County, Florida.

After review of the application and public comments, EPA will decide whether to issue or deny the permit and, if issued, the conditions under which the study is to be conducted.

Public comments about this proposed permit should be submitted to EPA-HQ-OPP-2019-0274 on or before October 11, 2019.

**EPA OECA UPDATE**

*Anthony Matusik, EPA/OECA/OC*

**WPS Focused Inspections Update:**

- A focused WPS inspection pilot will provide states and tribes with the option to conduct some inspections that evaluate a subset of WPS requirements, rather than requiring that all inspections be comprehensive compliance assessments.
- A potential value of using focused inspections is that they will require less time to conduct, enabling inspectors to quickly reach more establishments, using the same amount of resources. Focused inspections can also be valuable in educating the regulated community and even new inspectors on new regulatory requirements.
- A draft framework document describes the conditions under which focused inspections may be used, and what must be included as part of a focused WPS inspection.
- The draft framework document will be sent to SFIREG’s WPS work group for review and comment and thereafter distributed for review to the larger SFIREG membership. We are anticipating sending the framework out late September/early October and we are hoping for implementation beginning as early as mid-year 2020.

**FIFRA Inspection Manual Revisions**

- The updated Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Inspection Manual (dated August 1, 2019) is now available. The previous Manual
underwent a comprehensive review by a workgroup comprised of members from the Office of Compliance, the Office of Civil Enforcement, the Office of Pesticide Programs as well as Regions 2, 4, 5, 6, 8 and 10. Opportunities to comment on the revisions were provided for each Region as well as AAPCO, SFIREG and the TPPC. We appreciate the collaborative efforts of all who contributed to the revised Manual.

- The revisions included the addition of new or revised guidance, updated exhibits, and clarification of specific sections of text.
  - Updated CBI section to reflect that state or tribal inspectors have the option of accepting a double wrapped package containing CBI and delivering it, unopened, to EPA.
  - Updated the Interagency Referral section to delete a reference to Customs and Border Protection in the Memorandum of Understanding sub-section, as CBP was not a signatory to that MOU.
  - Added a new sub-section on Standard Operating Procedures for field activities implemented as a field quality management system in accordance with the EPA Quality Assurance Field Activities Procedure.
  - Added a new section on Notice of Inspection versus Consent to Enter to differentiate between presenting a Notice of Inspection and getting consent to enter private property. Language has been added in Chapter 5 and elsewhere to indicate that the absence of a Facility Official’s signature on a Notice of Inspection does not invalidate the NOI or establish that consent to enter was not provided or that proper procedures were not followed.
  - Updated language in the Payment for Samples section to identify that FIFRA is silent on the need to compensate a facility for a sample(s).


PIRT Updates
- 2020 PIRTs
  - Pesticide Enforcement and Use Concerns PIRT-
    - Massachusetts: End of April, beginning of May (Tentatively)
  - Basic/New Inspector PIRT-
    - Savannah, Georgia: September 28-October 2
  - Tribal PIRT-
    - Muscogee (Creek) Nation
  - Website- https://www.epa.gov/compliance/pesticide-inspector-residential-training-pirt

FED Talent Update
FedTalent, EPA’s new Learning Management System (LMS), will be used to take /
document all EPA Order 3500.1 inspector training.
Standard Operating Procedures will be developed to guide inspectors and first-line
supervisors on the implementation of FedTalent inspector training.
January 2020 – target date to fully launch FedTalent inspector training.
Non-EPA inspectors will have access to inspector training in FedTalent.
  o Non-EPA inspectors will need to request a FedTalent account. Guidance /
directions on how to request a FedTalent account will be available on the
Inspector Wiki late December 2019.
Guidance and instructions will be provided as we transition to the new LMS.
At this time, state inspectors should continue to access inspector training through the
inspector wiki & adobe connect.

DICAMBA 2019 GROWING SEASON IN INDIANA
Dave Scott, OISC

Please see attached Power Point.
Scott clarified that when the term ‘drift’ is used regarding dicamba, it refers to ‘off-target
movement’.
Scott discussed OISC’s approach to dicamba complaints this year, including the use of a
documentary investigation approach, where samples are not taken. There are too many possible
sources to be able to definitively determine where the off-target movement has come from
causing the damage.
Bond asked if there was an increase in acreage coinciding with the complaints. Scott said that it
is very difficult to determine affected acres at this point, as so much defensive planting has
occurred. OISC is using environmental data such as weather to help confirm that damage is
from dicamba as well, rather than drought or pest damage. This information is used to describe
the situation.
Regarding yield, OISC doesn’t do a yield reduction analysis, but they will be looking at Illinois
this year. R5 has been accommodating and OISC has a new cooperative agreement that includes
an increased complaint response, and lessens other program areas such as WPS.

DICAMBA ROUND ROBIN

MN: 2020 has been similar to IN. In 2018 they thought that the cutoff date had worked, but in
2019 they weren’t sure if the cut-off date or the planting date was responsible for reductions in
complaints, but they did have a reduction overall.
OR & WA: soybeans are not a significant crop in either state.
VA: VA has some of the resistant weed species, but they are not having enforcement issues.
NC: Enforcement cases have lessened; growers are living with small damage, but there are some
issues with niche crops being impacted.
FL: soybeans are not a significant crop
WI: they have had no cases this year, but they have lower soy acreage, and all of the surrounding states have had damage cases. They are starting to see resistant palmer amaranth along southern Illinois.

DICAMBA LABELS AD-HOC WORKING GROUP
*Liza Fleeson Trossbach, VA, SFIREG Chairperson*

Fleeson Trossbach recounted the dicamba label guidance developed by the ad-hoc workgroup, and noted that the guidance document includes old label language that isn’t sufficient, which may turn into recommendations for revision to EPA. There are also concerns because the registration process doesn’t actively include researchers, regulators or applicator groups.

Suggestions:
1. Have researchers be involved during registration, and request that researchers be able to conduct objective research with the products prior to federal registration and use. This will help determine if there are problems with the use that EPA should be aware of, and ensure that the research community is prepared to work with growers from the beginning of the registration.
2. Follow up to determine what data AAPCO or SFIREG can collect that would be helpful.
3. How to find successes?

POM CONCURRENT SESSION
*Thank you to Tom Hoffman from WSDA for these minutes!*

**September 24, 2019**

**Discussion of the SFIREG Dicamba Work Group – Guidance Document**
The need for broader discussion about content was suggested. Both POM and EQI will review the guidance document and suggest revisions from each group’s perspective which will be brought to the next SFIREG Joint meeting for possible inclusion into an updated guidance. POM needs to interact with EPA to improve provisions in pesticide labels. Stock language must be critically reviewed. POM reviewed the guidance document in detail and determined the elements the committee will review further and address with comments. Improving the label review process should be a long-term role of the POM committee.

**Pesticide Devices Making Public Health Claims**
It was proposed that consideration of the Region 4 white paper, Devices Making Public Health Claims (presented by Patrick Jones, NC), be delayed until reviewed by the EQI/POM Joint Committee (see notes below). POM had a preliminary discussion on device concerns. FIFRA defines a device as

“Any instrument or contrivance (other than a firearm) that is intended for trapping, destroying, repelling, or mitigating any pest or any other form of plant or animal life
Devices are not subject to the registration requirements that apply to pesticides and pesticide products under FIFRA section 3. However, if a device includes a substance, according to the November 19, 1976 Federal Register Notice, it is considered a pesticide and subject to registration under FIFRA section 3.

Technology has leaped ahead of FIFRA’s definition for devices. The outdated definition does not include products that produce substances that control microbes, similar to, but not limited to, hypochlorous acid generators. The lack of direction and enforcement from U.S. EPA related to devices and public health claims is of great concern. Hypochlorous acid generators are targeting communities of high risk, including the health care industry, and elderly care and childcare facilities. Often, these generators are the only antimicrobial being used to sanitize and disinfect.

Some states require the registration of devices. Indiana, for example, includes the devices within their definition of a pesticide product in the state pesticide law and, therefore, requires the regulation and registration of devices. The majority of states do not include devices within their normal pesticide registration processes.

FDA is the lead agency for products in health care. However, there is confusion as to who is regulating what devices – FDA or EPA. FDA was contacted about this issue but no response has been received.

The committee had a great discussion on this topic, with a collection of unanswered questions that will need to be addressed:

• Is the apparatus a device? pesticide? or both?
• Should registration data for claims made be required in registration of the device?
• Should claims and efficacy be reviewed, verified, and quantified?
• Should these pesticide devices making public health claims be deemed a public health concern?
• Do state health departments need to change their rules?
• Are state and county public health departments involved? Should they be involved?

The committee encourages SFIREG to determine who (state health departments, FDA, CDC) should receive a copy of the final white paper outlining these concerns. POM proposes to request an interpretation from EPA in the form of a policy statement.

Packaging of Multiple Products

Matthew Sunseri, MN
Kits or co-packs have been around since the 1990s. Antimicrobial products are being sold as co-packs for customer convenience. EPA requested and was sent several questions about the registration of multi-packs. In response, POM formed a subcommittee on this issue, including Matthew Sunseri (prior to term expiration), Dwight Seal and Robin Schoen-Nessa.

On February 16, 2018, Sunseri submitted the list of questions along with background information to the EPA. A response has not been forthcoming. Cynthia Parker, EPA, stated that the package was sent to someone who is no longer with EPA. As a result, no one was available to work on the issue or to respond to the questions. She would be the appropriate person to review these provided questions. Parker indicated that the Label Review Manual (LRM) is the current source for guidance in determining whether a co-pack should be issued a discrete registration number or if the registration number issued to individual products would suffice however questions remain. Concerns arise with the unenforceable nature of the LRM and current lack of guidance around kits or co-packs within the LRM.

The committee decided to evaluate the topic further and to bring a determination to the next joint working committee meeting as to the appropriate path forward. Rogers will distribute current document to committee members for review. POM proposes that EPA provide clarifying label review assistance and enforcement language on multi-packs/co-packs/kits be included in the LRM. By updating the LRM, it would function as an appropriate guidance to SLAs and Industry.

Unmanned Aerial Vehicles (UAVs)
Robby Personette, WI, AAPCO Technology Workgroup Chair
Personette supplemented his discussion on UAVs with a PowerPoint presentation (see presentations).
The AAPCO Technology Workshop was formed in May 2019 and currently is represented by nine members. There is one open position. Only one member is located west of the Mississippi River.

The workgroup’s mission:
Collaborate with stakeholders to gain a thorough understanding of issues associated with the use of new technologies within the existing regulatory framework, help develop guidance that will ensure consistent compliance interpretation and assistance, and serve as a communication hub on these topics.

If anyone is aware of someone who is interested in serving on the UAV Technology Workgroup, please contact Robby Personette.

Integrated Collection and Transfer of Information and Evidence
The Issue Paper was considered previously. It was revived, and the full SFIREG committee reviewed the Issue Paper in December 2018. The committee requested that POM members
review the document. The document proposes the central repository of inspections forms for EPA inspections, permitting the sharing of information with the intent to reduce duplication. The advantage of a comprehensive, single data system is lauded in 13 arguments. Committee discussion points about the concept:

- A reality is that many states have their own tracking system, sometimes proprietary in nature or off-the-shelf, and data logging protocol. States have formulated and enacted guidelines, many of which emulate those proposed in the comprehensive data proposal.
- To enable data sharing, software programming must be developed to integrate the myriad of systems used by states.
- Some state are challenged in archiving information, let alone assimilating, categorizing, coding, and archiving the information into a centralized repository.
- The cost to integrate state systems with a comprehensive depository could be considerable.
- While advantageous to have a centralize reference platform on federal inspections, EPA should be the lead entity in developing application integration.
- The comprehensive project is not realistic, given the diverse, numerous systems in use by states. Nonetheless, the information would be useful to states.
- Possibly a more refined scope would be more successful in initial implementation should this be pursued further.

Action items:

- Rogers proposed to table action until he has the opportunity to speak with an EPA Region 5 contact to better understand the background and intention behind this issue.

Label Project

*Rose Kachadoorian, OR, AAPCO President*

“Smart Label Project” is a long-term goal of AAPCO. EPA has stated its desire to pursue this matter. Label issues need to reflect EPA’s stance. Example: Is avoid synonymous with no? or Is drift language actually enforceable? More substantive information and procedural framework are needed for this to be realized, therefore it would be advantageous to create a central committee to establish goals, define scope, and strategize guidelines. Proposed focal points include:

- Label structure
- Label language
- Conflicting terminology
- Project will be a long-term undertaking.

For this endeavor to be realized, a project manager must be designated, at least to formally organize the undertaking and to conceptualize a plan of action. Patterson agreed to serve in this role. It was suggested that an issue paper be developed that could provide background on the issue, to establish a premise, and to state a position that is being taken. Eventually, project details should be coalesced into a White Paper that identifies the issues, advocates a position,
and proposes a solution in resolution of the problem. Once formulated, the plan will be forwarded to AAPCO.

As an element of the initial phase, states could be surveyed to identify specific labels, to assess gravity of the problem (problem analysis), and to determine a process in pursuing corrective action.

- Probative criteria will need to be established prior to surveying states.
- A metric will need to be framed to determine ranking of a problem’s scope (coding and documentation).
- Identify shortfalls and propose remedial narrative for EPA to incorporate into a revised manual.

Establish an Industry Relations Group, comprised of registrants who are willing to collaborate in revising label language.

**Action Items:**

**Dicamba Guidance**
- Compile comments for further discussion at the next joint working committee and transfer to SFIREG

**Pesticide Devices Making Public Health Claims**
- Jones will undertake action points as proposed

**Packing of Multiple Product**
- Rogers will send out Sunseri’s document. Committee will review/discuss further.

**UAVs**
- No action necessary

**Integrated Collection and Transfer of Information and Evidence**

**Label Review Project**
- Assist Patterson in formulating the label review program and authoring an Issues Paper.
- Determine criteria used in developing the metric. Sarah Caffery will provide examples.
- Contact SFIREG to identify problematic labels.

**EQI CONCURRENT SESSION**

**WATER QUALITY MONITORING LABORATORY**
*Ping Wan, OISC Pesticide Analytical Laboratory*

Please see presentation.

**PESTICIDE DEVICES MAKING PUBLIC HEALTH CLAIMS**
*Patrick Jones, NC*
Please see presentation.

There was significant concern regarding the efficacy and lack of submitted data related to the use pattern described (using sodium chloride to produce hypochlorous acid for fumigation and as the sole source of disinfection in hospitals). North Carolina will be submitting an Enforcement Case Review to the agency, and we expect there will be conversations with federal public health entities to further determine agency authorities. EPA is unsure of their authority, since they cannot as for efficacy data for an unregistered product, although there is evidence that this is being used as a pesticide and meets the criteria for a pesticidal device. Regardless of authority, the possibility of harm to human health requires action to assess the efficacy of the product as it is being used and for the purposes for which it is being used.